

FILED

SEP 18 1995

HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680
a California not-for-profit)
religious corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
a California for-profit)
corporation; DOES 1 through 100,)
inclusive,)

Defendants.)

EVIDENCE IN SUPPORT
OF OPPOSITION TO
MOTIONS FOR SUMMARY
ADJUDICATION OF 20TH
CAUSE OF ACTION; AND
13TH, 16TH, 17TH &
19TH CAUSES OF ACTION
OF SECOND AMENDED
COMPLAINT

Date: 9/29/95
Time: 9:00 a.m.
Dept: One
Trial Date: Not Set

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SEP 18 1995

HUB LAW OFFICES

VOLUME V

DECLARATION OF GERALD ARMSTRONG

1. My name is Gerald Armstrong. I am the defendant and cross-complainant in the above action, am above the age of 18 years old and am competent to testify to the matters set forth herein on the basis of my own first-hand knowledge as either a human being, litigant or witness.

2. In the instant case I provided deposition testimony and was present for depositions of co-defendant Michael Walton as well as for Lynn Farny whom Church of Scientology International produced as its corporate representative for the purposes of this litigation pursuant to Code of Civil Procedure section 2025 (d).

3. I am the defendant in Church of Scientology International v. Armstrong, Los Angeles Superior Court, Case No. BC 053295 and have provided deposition testimony therein and have been present during the deposition testimony therein of Michael Walton.

4. I was a witness in Church of Scientology International v. Yanny, Los Angeles Superior Court, Case No. BC 033035 and provided deposition testimony therein.

5. I am a former member of the Scientology organization and am familiar with the policies and procedures thereof.

6. Attached hereto and incorporated herein are true and correct copies of the following items:

EXHIBIT 1(A): Declaration of Nancy Rodes dated November 29, 1989;

EXHIBIT 1(B): Certificate of Saint;

EXHIBIT 1(C): Deposition testimony of Armstrong in Church of Scientology International v. Yanny, Los Angeles Superior Court, Case No. BC 033035 ("Yanny II")

- 1 EXHIBIT 1(D): Declaration of Gerald Armstrong dated January
2 13, 1994.
- 3 EXHIBIT 1(E): Gerald Armstrong's prayer to God and His
4 Answer dated August 13, 1990.
- 5 EXHIBIT 1(F): Deposition testimony of Gerald Armstrong in
6 Church of Scientology International v.
7 Armstrong, Los Angeles Superior Court, case
8 No. BC 053295 ("Armstrong II")
- 9 EXHIBIT 1(F): Deposition testimony of Michael Walton in
10 Church of Scientology International v.
11 Armstrong II.
- 12 EXHIBIT 1(H): Deposition testimony of Gerald Armstrong
13 herein.
- 14 EXHIBIT 1(I): Deposition testimony of Michael Walton herein.
- 15 EXHIBIT 1(J): Letter from Armstrong to Andrew Armstrong;
- 16 EXHIBIT 1(K): Letter from Armstrong to Lorrie Eaton;
- 17 EXHIBIT 1(L): Letter from Armstrong to Jerry Solfvin;
- 18 EXHIBIT 1(M): Letter from Armstrong to Bruce, Tricia and
19 Anne-Leigh (Dawson Family);
- 20 EXHIBIT 1(N): Letter from Armstrong to Michael and Kima
21 Douglas ("Douglasses");
- 22 EXHIBIT 1(O): Letter from Douglasses to Armstrong;
- 23 EXHIBIT 1(P): Promissory Note from Douglasses to Armstrong;
- 24 EXHIBIT 1(Q): Promissory Note from Douglasses to Armstrong;
- 25 EXHIBIT 1(R): Promissory Note from Douglasses to Armstrong;
- 26 EXHIBIT 1(S): Note from Douglasses to Armstrong.
- 27 EXHIBIT 1(T): Order dated March 9, 1990 in Church of
28 Scientology of California v. Armstrong,
California Court of Appeal, Second Appellate
District, Case No. Bo25920.
- EXHIBIT 1(U): Deposition testimony of Lynn Farny ("Farny"),
Secretary and corporate representative of
plaintiff CSI;
- EXHIBIT 1(V): Hubbard Communications Policy Letter "Verbal
Tech: Penalties"
- EXHIBIT 1(W): Hubbard Communications Policy Letter "Policy:

Source Of"

EXHIBIT 1(X): Hubbard Communications Policy Letter
"Seniority of Orders"

EXHIBIT 1(Y): Hubbard Communications Policy Letter "Policy
and Orders"

EXHIBIT 1(Z): Hubbard Communications Policy Letter
"Suppressive Acts - Suppression of Scientology
and Scientologists"

EXHIBIT 1(AA): Flag Conditions Order 6664

EXHIBIT 1(BB): Flag Conditions Order 6664R

EXHIBIT 1(CC): Flag Executive Directive 2830RB "Suppressive
Persons and Suppressive Groups List

EXHIBIT 1(DD): Office of Special Affairs International
Executive Directive No. 19 "Squirrels."

EXHIBIT 1(EE): Hubbard Communications Policy Letter
"Penalties for Lower Conditions."

EXHIBIT 1(FF): Hubbard Communications Policy Letter
"Cancellation of Fair Game."

EXHIBIT 1(GG): Hubbard Communications Policy Letter "How to
Handle Black Propaganda - Rumors and
Whispering Campaigns,"

EXHIBIT 1(HH): Hubbard Communications Policy Letter "Black
PR,"

EXHIBIT 1(II): Dissemination of Material" from "Magazine
Articles on Level O Checksheet,"

7. After I divested myself of my assets and material
possessions in August 1990, I was not insolvent because the debts
that I owed did not exceed my ability and means to pay them.

8. I have and never have had any agreement, secret or
otherwise, with any of the beneficiaries of my gifts of my assets
or my forgiving of debts owed to me in August, 1990 whereby any of
said beneficiaries are holding such assets or amounts owed in
trust for me, or otherwise have an intent to return such assets or

1 amounts owed to me.

2 9. In August, 1990, I had no intent to violate the
3 settlement contract and no intent to deprive Scientology of its
4 ability to collect damages owed to it.

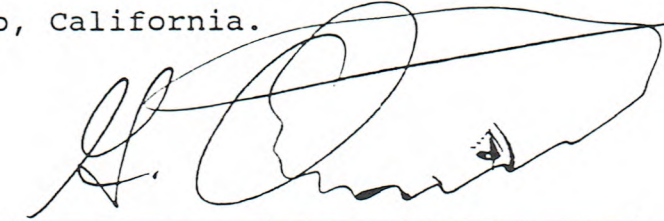
5 10. In August, 1990, I had not engaged in any conduct that
6 could possibly be construed as having violated the settlement
7 contract, with the exception of requesting permission from the
8 Court of Appeal to participate in the litigation of my own appeal,
9 which paragraph 4 of the settlement contract prohibited me from
10 doing. In support of my request for permission to so participate
11 in his appeal I submitted the settlement contract to the Court of
12 Appeal under seal.

13 11. From 1971 through 1981 I was a member of Scientology's
14 elite "Sea Organization." The Sea Organization runs Scientology.
15 During that time I became familiar with the Hubbard Communication
16 Policies entitled "Penalties for Lower Conditions" dated 18
17 October, 1967 and "Cancellation of Fair Game" dated 21 October,
18 1968, true and correct copies thereof are attached hereto as
19 Exhibits EE and FF respectively. I learned and knew while inside
20 Scientology that the "cancellation" of Fair Game is of the name
21 only, and does not affect the way SPs (suppressive persons) are to
22 be treated.

23 12. During the time I was inside Scientology I was also
24 familiar with the article written by L. Ron Hubbard entitled
25 "Dissemination of Materials," know that it was uncanceled and
26 valid Scientology policy during the time I was inside, and I have
27 personal knowledge that the way in which Hubbard orders that
28 opponents be dealt with in said article is exactly what was

1 intended and carried out by the Scientology organization. A true
2 and correct copy thereof is attached hereto as Exhibit GG.

3 Under penalty of perjury and pursuant to the laws of the
4 State of California I hereby declare that the foregoing is true
5 and correct to the best of my personal knowledge. Executed this
6 August 12, 1994 at San Anselmo, California.

A handwritten signature in black ink, appearing to read 'Gerald Armstrong', is written over a horizontal line. The signature is stylized with large, sweeping loops.

GERALD ARMSTRONG

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on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

[X] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[] (Personal) I caused said papers to be personally service on the office of opposing counsel.

[X] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

~~G. K. Henry III~~

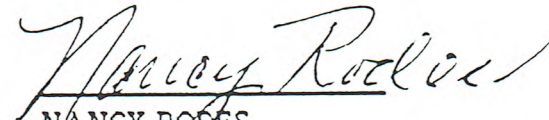
DECLARATION OF NANCY RODES

I, Nancy Rodes, declare:

1. I have known Gerald Armstrong since 1978.
2. I have been his hagiographer since 1984.
3. I know him to be a religious figure.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of November, 1989, in Oakland, California.


NANCY RODES

THE CHURCH

In recognition of the Faith, Love and Charity

he displays, does hereby Name

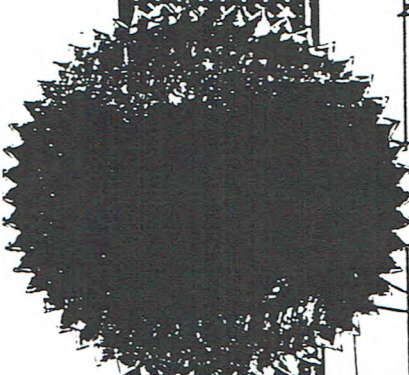
Gerald David Armstrong

As a

SAINT

By the Authority Invested in Us, as Two or More Members of the Church
Gathered Together in Thy Name, Signed this 18th Day of October 1987:

William E. Clark
James E. Faust
James E. Faust



1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF LOS ANGELES
3
4

- - -

5 RELIGIOUS TECHNOLOGY CENTER, A)
6 California Non-Profit Religious)
7 Corporation; CHURCH OF)
8 SCIENTOLOGY INTERNATIONAL, A)
9 Non-Profit Religious Corporation;)
and CHURCH OF SCIENTOLOGY OF)
CALIFORNIA, A Non-Profit)
Religious corporation,)

Plaintiffs,)

vs.)

No: BC 033035

11 JOSEPH A. YANNY, an individual;)
12 JOSEPH A. YANNY, a professional)
13 law corporation, and DOES 1-25,)
inclusive,)

Defendants.)

VOLUME III

16 VOLUME III - DEPOSITION OF
17 GERALD ARMSTRONG

18 SANTA MONICA, CALIFORNIA

19 MARCH 16, 1992
20

21 ATKINSON-BAKER AND ASSOCIATES, INC.
22 CERTIFIED SHORTHAND REPORTERS
1612 West Olive Avenue, Suite 203
Burbank, California 91506
23 (818) 566-8840

24 REPORTED BY: JAN SERRA, CSR NO. 8207

25 FILE NO.: 9202566

1 would decline to answer. I don't think that that's
2 appropriate, and I would assert a right of privacy
3 with regards to membership. Even numbers.

4 Q Could you answer anyway please?

5 A No, I decline to answer that.

6 THE REFEREE: I don't see that the
7 numbers as such, I don't think the disclosures of
8 numbers as such could be of purely substantial
9 significance one way or another. But I do instruct
10 you to answer.

11 A Okay.

12 Then of those that I know about,
13 approximately 30.

14 Q BY MR. MOXON: How does one become a
15 member?

16 MR. PATEL: I've held my tongue on this,
17 but a lot of this has been asked and answered in the
18 prior two volumes. If I could just register that
19 objection.

20 THE REFEREE: Have these question's been
21 asked and answered?

22 MR. GREENE: Yes, in fact they have.

23 I have not jumped in just for the sake of
24 establishing some kind of foundation and context for
25 Your Honor. But almost all of the questions thus far

1 have been previously asked and answered.

2 MR. MOXON: Your Honor, these questions
3 have been answered. A number of them have been
4 refused to be answered. It's impossible to have any
5 context to any of these questions unless some of these
6 foundational questions are laid. Perhaps five minutes
7 as to questions as to several of these foundations.

8 THE REFEREE: Are we past that point now?

9 MR. MOXON: Pretty much.

10 THE REFEREE: Then we'll treat these as
11 foundational so far and go from here.

12 MR. MOXON: Thank you.

13 Q BY MR. MOXON: How does one become a
14 member?

15 A One agrees that the belief of the Church
16 is that when members are together, God is present.

17 Q Is there, is anything in writing?

18 MR. GREENE: You mean with respect to how
19 one becomes a member?

20 MR. MOXON: Yes.

21 A That has now been put to writing in the
22 last deposition transcript, and I believe the
23 deposition transcript before that.

24 ~~But~~ and the belief and the corrolary and
25 the obvious are in writing, have been in writing since

1 1986.

2 Q BY MR. MOXON: The only writing with
3 respect to membership is in the deposition transcript?

4 MR. GREENE: Objection, that is an
5 argumentative question. He just answered the question
6 saying that there had been writing since 1986.

7 THE REFEREE: Well, sustained, just as to
8 form.

9 Q BY MR. MOXON: I'm just talking about the
10 membership now.

11 As to membership, is the only writing of
12 how one becomes a member your prior deposition
13 transcript?

14 A No.

15 The belief, the corrolary and the obvious
16 have been in with writing.

17 Q What's "the belief?"

18 MR. GREENE: Objection, asked and
19 answered.

20 A The belief is that when members of the
21 Church are together, God is present.

22 Q BY MR. MOXON: Is there any other belief?

23 A There may be many other beliefs, but that
24 is the belief of the Church.

25 Q I'm sorry, I don't understand your

1 answer.

2 Is there any other belief of the Church?

3 A Not in writing.

4 Q What's "the corrolary?"

5 A That whatever is said or done when

6 members of the Church are together is sacred.

7 Q What's "the obvious?"

8 A That it has always been that way, is now

9 and will ever be so.

10 Q Is anything else, any other practices,

11 beliefs or dogma of the Church in writing other than

12 what you just testified concerning "the belief, the

13 corrolary and the obvious?"

14 A There is something that I call spin off.

15 Q What's "spin off?"

16 A One piece of spin off is that when a

17 member of the Church is together, God is present.

18 Q I don't understand your answer.

19 When a single member is present God is

20 present?

21 *present* A When he's together, God is ~~together~~.
A

22 Q I don't understand.

23 You're using a singular -- when a member

24 is together with what?

25 A When he's together.

1 Q What do you mean by, would you define
2 your use of the word "together?"

3 A Not split into separate parts.

4 Q So when a member is not split into
5 separate parts, what happens?

6 A God is present.

7 Q Any other policies or beliefs?

8 MR. GREENE: Objection. The term policy,
9 belief, dogma is getting thrown around kind of loosely
10 and they're compound.

11 Why don't you just ask one question at a
12 time?

13 THE REFEREE: Alright. Just as to form.

14 Q BY MR. MOXON: Are there any other
15 policies, other than what you've stated, to the
16 Church?

17 A The Church really has not given any
18 policies. The Church has stated its belief, corrolary
19 thereto and the obvious. The spin off is something
20 which I came to mean rather humorously.

21 ~~Most~~ er CBP there has been far more written
22 about the Church and about Church practices and dogma
23 in my deposition transcripts than in any other place.

24 Q You say the Church has stated a belief --

25 A The Church.

1 Q Where has the Church stated a belief?

2 MR. GREENE: Objection, it's
3 argumentative.

4 It's badgering the witness.

5 MR. PATEL: Also asked and answered.

6 THE REFEREE: Other than the answers
7 you've already given, can you answer this question?

8 A I'm not quite sure what you want in
9 addition to what I've stated.

10 Q BY MR. MOXON: Alright.

11 Well, there is nothing else? There are
12 no other written statements of beliefs, corrolaries,
13 obvious doctrines, policies or dogma other than what
14 you've already stated, is that correct?

15 A Right. Those are what have been written.

16 Q Do you have any ordained ministers?

17 MR. GREENE: Objection, vague as to
18 "ordained."

19 MR. PATEL: And if I may also make an
20 objection, based on the prior testimony I believe that
21 the use of the term "ministers" may be vague and
22 ambiguous.

23 A Perhaps I can --

24 THE REFEREE: Go ahead.

25 A -- help out.

1 Members of the Church, should they choose
2 to perform the function of ministers.

3 Q BY MR. MOXON: Correct me if I'm wrong
4 then.

5 A As I understand your testimony there are
6 no ministers per se, but if a member chooses to be a
7 minister you consider him to be a minister?

8 A I generally do not use the title
9 "minister." But I understand the function of a
10 minister. So in that sense members of the Church may
11 perform that function.

12 Q You say they may perform that function.

13 A As I understand it, again, from your
14 prior testimony, there are no ministers per se,
15 correct?

16 A The title may or may not be used. I do
17 not use that title.

18 Q You actually don't have any titles in the
19 Church at all, correct?

20 A I'm the founder.

21 Q Other than your title as founder?

22 A That's the only title that I have in the
23 Church.

24 Q By the way, when did you found this
25 Church?

1 A 1986.

2 Q So you don't have any ordained ministers,
3 correct?

4 MR. PATEL: Same objections.

5 THE REFEREE: I think it has been asked
6 and answered, so let's go ahead.

7 Q BY MR. MOXON: You indicated that
8 everything -- whenever two members of the Church are
9 together everything they say is sacred.

10 Is that a fair approximation of this
11 corrolary?

12 A Whatever is said or done between members
13 of the Church is sacred.

14 Q Suppose two members of the Church commit
15 a criminal act, is that sacred, if they do it
16 together?

17 A I have never entertained that idea,
18 because by its nature the Church does not lend itself
19 to criminal acts.

20 Q I'm not talking about an act of the
21 Church, I'm talking about acts of two members.

22 If two members commit a criminal act
23 together is that a sacred act of the Church?

24 A I really can't answer that. I don't know
25 what you mean by "a criminal act."

1 STATE OF CALIFORNIA)

2

3 COUNTY OF LOS ANGELES)

4

5 I, JAN W. SERRA, CSR No. 8207,

6 Certified Shorthand Reporter, certify:

7 That the foregoing proceedings were,
8 taken before me at the time and place therein set
9 forth, at which time the witness,

10 GERALD ARMSTRONG,

11 was put under oath by me;

12 That the testimony of the witness And
13 all objections made at the time of the examination
14 were recorded stenographically by me and were
15 thereafter transcribed;

16 That the foregoing is a true and correct
17 transcript of my shorthand notes so taken.

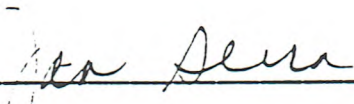
18 I further certify that I am not a
19 relative or employee of any attorney of any
20 of the parties, nor financially interested in
21 the action.

22 Dated this March 24, 1992.

23

24

25



Certified Shorthand Reporter

8-1-90

Please guide me.

Keep nothing.

Give what you have to
the poor.

Take only what you need.

EX 7
3/17/94
GA

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES

--oOo--

CHURCH OF SCIENTOLOGY INTERNATIONAL,
a California not-for-profit religious
corporation,

COPY

Plaintiff,

vs.

No. BC 052395

GERALD ARMSTRONG; DOES 1 through 25,
inclusive,

Defendants.

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AUG 21 1992

HUB LAW OFFICES

DEPOSITION OF
GERALD ARMSTRONG

Wednesday, July 22, 1992

Volume II, Pages 179 - 293

REPORTED BY: KATHERINE NG, CSR NO. 6350

1 A. No.

2 Q. Did you give any of it to Michael Walton?

3 A. Yes.

4 Q. Why did you give it away?

5 A. Because I considered that I was guided to do
6 so.

7 Q. By whom?

8 A. The source of all that is.

9 Q. Who is that?

10 A. God.

11 Q. Now, when God guided you to give away all your
12 assets, did he guide you to give them to particular
13 people or did you make that decision?

14 A. I believe that I was guided each step of the
15 way.

16 Q. Okay. When you say you gave it away, I take it
17 you didn't receive anything in return in terms of
18 monetary compensation?

19 A. Right.

20 Q. Can you tell me why you decided to give some of
21 it to Michael Walton?

22 A. Because it was logical.

23 Q. Why?

24 A. And because it was so guided.

25 Q. Can you tell me what about it was logical?

1 A. I guess initially it's logical because he was a
2 friend of mine in close proximity to me, and I believed
3 that he had a need at that time.

4 Q. Okay. What did you give him?

5 A. I decline to comment to answer that. I don't
6 see how it fits into this, other than the fact that I
7 gave everything away.

8 Q. I won't press that at this point, but it will
9 be relevant.

10 Q. What did you have in August of 1990 that you
11 gave away?

12 A. Cash, property, stock, rights and debts owed to
13 me.

14 Q. Okay. Let's start with the cash. How much
15 cash did you give away?

16 A. I don't think that that's appropriate for me to
17 get into. I decline to answer.

18 Q. Well, I'll tell you why it's relevant. And if
19 it isn't, it can be made relevant by the complaint.
20 Under the Fraudulent Conveyance Act, fraudulent
21 conveyances are defined in a number of ways, including
22 transfers without considerations, which these are by
23 virtue of Mr. Armstrong's testimony.

24 A. By which you mean therefore every donation made
25 by every Scientologist is of necessity a fraudulent

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

--oOo--

CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California)
not-for-profit religious)
corporation,)

Plaintiff,)

vs.)

GERALD ARMSTRONG; and)
DOES 1 through 25, inclusive,)

Defendants.)
-----)

ORIGINAL

Case No. BC 052395

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HUB LAW OFFICES

DEPOSITION OF MICHAEL WALTON

Pages 1 - 61

Taken before CHRIS DE GEORGE

California CSR License No. 7069

February 24, 1993

--oOo--

1 my lawyer files and I don't know if they belong --
2 some of them, I'm sure, belong to Gerald Armstrong.

3 Q. Let's exclude those.

4 A. No.

5 Q. So excluding attorney-client files, you
6 hold no property for or on behalf of Gerald
7 Armstrong.

8 A. No.

9 Q. And he's never transferred any property
10 to you.

11 A. Yes, he has.

12 Q. What has he transferred to you?

13 A. He transferred his interest in Fawn
14 Drive to me.

15 Q. And what consideration did you pay him
16 for that?

17 A. None.

18 Q. It was a gift?

19 A. Yes.

20 Q. And when did that occur?

21 A. I think it was around the time of the
22 Desert Storm. I don't -- I really don't -- I'm not
23 quite sure. I can tell you it was -- it was
24 approximately a year before the -- No, I can't tell
25 you that either. I'm not really sure.

1 Q. Do you know why he transferred it to
2 you?

3 A. I know what he told me.

4 Q. What did he tell you?

5 A. I'm trying to remember it. Let me think
6 about it and see if I can remember under what
7 circumstances.

8 I don't believe this has any relation to
9 any representation. Jerry told me that he'd had a
10 vision from God.

11 Q. That's it?

12 A. That's the reason. That's when he
13 divested of all property that I know of.

14 Q. Where is Jerry living now, do you know?

15 A. No, I don't. I think he's living on Sir
16 Francis Drake. 711, I think.

17 Q. That's one of the -- that's either
18 adjacent to or the office where Ford Greene has his
19 practice?

20 A. That's my understanding although I've
21 never been there.

22 Q. Other than Fawn Drive, did Mr. Armstrong
23 give you any other property at that time?

24 A. Yes.

25 Q. What else?

1 A. A dining room table and I think a
2 ladder.

3 Q. Let's forget about the dining room table
4 and the ladder. That's it, just the dining room
5 table, the ladder and the house; is that right?

6 A. Yes.

7 Q. No cash?

8 A. No, there was a cash fund that was set
9 up to run the house for a year and that -- my name
10 was already on that although it was my understanding
11 that it was -- it was to be transferred and still to
12 be used for the house if I wanted it.

13 Q. You and Mr. Armstrong became involved in
14 a partnership that owned 711 Fawn Drive, is that
15 right? I got the address wrong. Let's just call it
16 Fawn Drive.

17 A. Well, at this point you know I have to
18 -- I made a judgment to -- At some point this
19 invades my right of privacy, personal privacy. I'm
20 not sure what my -- my dealings with Mr. Armstrong
21 have to do with this litigation. When I asked
22 Ms. Bartilson, she said there was some concern that
23 he had fraudulently transferred property and I'm not
24 sure how that -- I didn't -- I haven't read the
25 pleadings but I haven't seen any allegations of

1 STATE OF CALIFORNIA)
2)

3 I, the undersigned, a Certified Shorthand
4 Reporter of the State of California, hereby certify
5 that the witness in the foregoing deposition was by
6 me duly sworn to testify to the truth, the whole
7 truth, and nothing but the truth in the within-
8 entitled cause; that said deposition was taken at
9 the time and place therein stated; that the
10 testimony of said witness was reported by me, a
11 Certified Shorthand Reporter and a disinterested
12 person, and was thereafter transcribed under my
13 direction into typewriting; that the foregoing
14 is a full, complete and true record of said
15 testimony; and that the witness was given an
16 opportunity to read and, if necessary, correct said
17 deposition and to subscribe the same.

18 I further certify that I am not of counsel or
19 attorney for either or any of the parties in the
20 foregoing deposition and caption named, nor in any
21 way interested in the outcome of the case names in
22 said action.

23 IN WITNESS WHEREOF, I have hereunder set my
24 hand and affixed my signature this 1st day of March,
25 1993.


CHRIS DEGEORGE, CSR #7069

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF MARIN

3 --oOo--

4 CHURCH OF SCIENTOLOGY,)
5 INTERNATIONAL, A California)
6 Not-For-Profit Corporation,)

7 Plaintiffs,)

8 vs.)

9 GERALD ARMSTRONG, MICHAEL)
10 WALTON, et al.,)

11 Defendants.)
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No. 157 680

DEPOSITION OF

GERALD ARMSTRONG

22 --oOo--

23 Thursday, March 17, 1994

24 REPORTED BY: Sheenagh M. Carlson, CSR NO. 8350
25

202359

1 Q. Okay. You don't recall; is that --

2 A. No, it wasn't, wasn't a huge amount,
3 if it was.

4 Q. So if you had some, it was some
5 fairly minor amount, a few thousand dollars?

6 A. Something like that.

7 Q. All right. You had, whatever cash
8 you had you had in the Fawn Drive house. What
9 other assets did you have at that time?

10 A. I had the corporation.

11 Q. Okay. Your interest in TGAC?

12 A. Right. Right. And I was owed some
13 money, and I had some cash flow from payments which
14 were made to me.

15 Q. Is that the same thing, you were
16 owed money and had cash flow from the payments that
17 were made or two separate things?

18 A. Right, that's the cash you're
19 looking for.

20 Q. Who owed you what?

21 A. Without getting into any names,
22 there was an individual who owed me about 16.

23 Q. Thousand?

24 A. Yes. There was another individual
25 who owed me 30. There was another, a family who

1 owed me about 20,000. And there was another couple
2 who owed me -- um, I'm not sure how much it is. I
3 believe somewhere between 70 and 100. Something
4 like that.

5 Q. Okay. Now, were all those amounts
6 eventually paid back to you?

7 A. No.

8 Q. All right. Let's take the first
9 individual with the 16,000. How much of that was
10 not paid back?

11 A. The majority.

12 Q. Do you have -- that could be
13 anywhere from 8,000 and up. Do you have any better
14 idea than that?

15 A. Probably my recollection is about 15
16 of the 16 were not paid back.

17 Q. Can you tell me who that is, please,
18 the person's name?

19 A. I know you'd like to make it
20 relevant for this case, but I don't want to make
21 all these people the target of your organization.

22 Q. I'd still like to know the name.

23 A. I know you'd like to, but I don't
24 think that it's right to do that. I know that
25 you'll add them in and I know you'll try to break

1 them financially and I know you'll try to make
2 their life miserable. I know you'll try to get to
3 me by getting to them.

4 Q. Well --

5 A. And I know that you know that your
6 fraudulent conveyance lawsuit is fraudulent.

7 MR. GREENE: Just answer the
8 question, Gerry.

9 THE WITNESS: I don't want to answer
10 that question.

11 MR. WILSON: Can I -- can you please
12 instruct the witness to answer the question?

13 MR. BENZ: Okay.

14 MR. WILSON: I haven't even heard an
15 objection.

16 MR. BENZ: There isn't an objection.

17 MR. GREENE: I'll object on the
18 basis of relevance.

19 MR. WILSON: Well, I think --

20 MR. BENZ: Mr. Wilson?

21 MR. WILSON: I think it is relevant.
22 I'm entitled to find out whether the forgiveness of
23 that obligation might be a fraudulent conveyance.
24 Notwithstanding Mr. Armstrong's polemics, that's
25 all we intend to do. And we have no intent to

1 harass anyone or bring them in unless it appears
2 there was a fraudulent conveyance. But merely
3 Mr. Armstrong telling me that he made a loan and it
4 didn't get paid back and he won't tell me the name
5 isn't really enough.

6 MR. GREENE: It's also not related
7 to the allegations of the complaint.

8 MR. WILSON: No, the complaint
9 contains allegations of fraudulent conveyance and I
10 suppose -- we went through this before. We can
11 allege that there may be other fraudulent
12 conveyances that we don't know about. It's very
13 common in litigation where you have one claim and
14 you find out that you may have others that are
15 similar.

16 MR. BENZ: I think in this case
17 Plaintiff is entitled to know the name of the
18 party. So, the witness is directed to answer the
19 the question.

20 THE WITNESS: Okay.

21 BY MR. WILSON:

22 Q. What's his name, please?

23 A. Jerry Solfvin.

24 Q. Can you spell that?

25 A. S-O-L-F-V-I-N.

1 Q. You went too fast for me. Spell the
2 last name.

3 A. S-O-L-F-V-I-N.

4 Q. And do you know where he lives,
5 where I can find him?

6 A. I believe Oakland, California.

7 Q. Okay. Now, has there been a formal
8 agreement between you and Jerry to forgive the
9 indebtedness or is it that you just haven't pursued
10 it?

11 A. I wrote him.

12 Q. What did you tell him when you wrote
13 him?

14 A. I wrote him and said that I forgave
15 his debt to me.

16 Q. Okay. When did you do that?

17 A. August 1990.

18 Q. All right. If you wanted to find
19 that letter, could you do so?

20 A. I think so.

21 Q. Okay. Does the letter have the
22 amount that's forgiven or does it say I forgive
23 your debt?

24 A. It doesn't have the amount.

25 Q. Okay. Fair enough. Let's go to the

1 second individual. Who is that, please?

2 A. I'm not sure.

3 Q. The person that you owed 30,000,
4 that owed you \$30,000? Actually, there's -- yes.
5 Who is that?

6 MR. GREENE: Same objection,
7 relevance. Not relevant to the allegations of the
8 complaint.

9 MR. BENZ: Same ruling.

10 THE WITNESS: Michael Walton.

11 BY MR. WILSON:

12 Q. Okay. Did you write him in August
13 of 1990 and forgive the rest of this too?

14 A. Uh-huh.

15 Q. Do you remember how much it was?

16 A. How much what was?

17 Q. How much the balance was. You
18 loaned him 30, how much was owed?

19 A. I don't, I don't know then.

20 Q. Do you have an approximate number?

21 A. I, it was close to that.

22 Q. All right. Now, you said there's a
23 family that you owed, that you loaned 30,000 too.
24 Who was that?

25 A. The Dawsons.

1 Q. And where are they?
2 A. Massachusetts.
3 Q. Okay. What are their first names,
4 if you --
5 A. Um, Iolna, I-O-L-N-A.
6 Q. Uh-huh.
7 A. And then there are some children
8 involved.
9 Q. Did you write to her in August of
10 1990 and forgive the balance of that debt?
11 A. Yes.
12 Q. And was it approximately 30,000?
13 A. Something like that.
14 Q. All right. I didn't ask you this
15 question about the letter to Mr. Walton and the
16 letter to the Dawsons. If you looked for those
17 letters, could you find it?
18 A. I think so.
19 Q. The final one that you mentioned was
20 a couple that you loaned 70 or \$100,000 to. Who
21 was that?
22 A. The Douglasses.
23 Q. The Douglasses?
24 A. Yes.
25 Q. That's Michael and Kimit?

1 A. Kim.

2 Q. Kima?

3 A. K-I-M.

4 Q. Okay.

5 A. Then there's another one too.

6 Q. I'm not finished with that one. I

7 appreciate your volunteering, but did you also

8 write them in August of 1990 telling them you

9 forgave the debt?

10 A. Right.

11 Q. And you could find that letter if

12 you looked for it?

13 A. I believe so.

14 Q. Okay. You said there was someone

15 else?

16 A. Lorrie Eaton.

17 Q. Okay.

18 A. L-O-R-R-I-E, E-A-T-O-N.

19 Q. And how much was your loan to her?

20 A. I'm not sure. A few thousand.

21 Q. Five or six or seven?

22 A. Something. I don't know.

23 Q. All right. And did you forgive that

24 in August of 1990?

25 A. Yes.

1 Q. Wrote her a letter?
2 A. Uh-huh.
3 Q. And you could find it if you looked
4 for it?

5 A. I think so.

6 Q. All right. I'd like to go back to
7 1986 when you settled with the church?

8 A. I'd like to, too.

9 Q. So would the church. Do you recall
10 when it was that you got the settlement payment
11 from Mr. Flynn, approximately?

12 A. Sometime in December.

13 Q. Okay. Do you remember how much it
14 was?

15 A. I think it came out to 518
16 something.

17 MR. WALTON: Could I, could I make
18 an objection here regarding the relevance of all
19 this stuff that's pre-1990 I believe is when, is it
20 1990, the date that the complaint alleges that
21 there was a grievous behavior on the part of
22 Mr. Armstrong? And all this stuff before, I'm not
23 sure what is -- it's sort of like, not only does it
24 seem to be irrelevant, but it seems to me, it looks
25 like they are trying to do a sort of asset check

1 before there's a judgment here.

2 MR. WILSON: Well, the relevance is
3 essentially the same relevance as the names of the
4 people he owed money to. We know of one conveyance
5 that we believe is fraudulent. We may have found
6 out about some others and there may be even more.

7 MR. WALTON: There may be more, but
8 certainly if we're talking about your definition of
9 fraudulent conveyance, which you've written about a
10 number of times, the fraudulent conveyance makes
11 you a creditor at the time there's a difficulty
12 that's arisen and a right to claim yourself as a
13 creditor. In 1986 or 1985, or '87, '88 or '89,
14 you -- there's no claim anywhere that there was
15 anything that would have given rise to creditor
16 status at that time.

17 MR. WILSON: Well, that isn't really
18 the issue. The issue is what, if you don't know
19 what the person's assets were, you don't know what
20 questions to ask to find out whether there were
21 fraudulent conveyances. And this is discovery;
22 this isn't a trial. So whether, whether it's
23 relevant at trial is not at issue here. It's
24 whether it might lead to discoverable evidence
25 here. And asking Mr. Armstrong when he got the

1 money, how much he got and what he did with it,
2 might lead to discoverable evidence.

3 MR. WALTON: You represent the
4 church and the church is the entity that, that
5 wrote the checks. So, you know, your client knows
6 exactly when and exactly how much was delivered. I
7 mean, I'm not sure --

8 MR. WILSON: That's not true.

9 MR. WALTON: I don't see the
10 relevance.

11 MR. WILSON: The settlement was a
12 settlement with a group of people who were
13 represented by Mr. Flynn and Mr. Flynn was the one
14 who knew how much each of them got. The church did
15 not know how much each of the settling parties got.

16 MR. GREENE: And witnesses.

17 MR. WILSON: Whoever.

18 MR. WALTON: But how much, how is it
19 relevant? What's the --

20 MR. BENZ: If I can interrupt. I
21 don't think I can rule on this question because
22 this question is basically preliminary to the
23 contract. Now, if we get into -- depends on where
24 you go from there.

25 MR. GREENE: That's why I haven't

1 objected yet.

2 MR. BENZ: Okay.

3 MR. GREENE: I don't have any
4 problem with this preliminary question and Gerald
5 answering it. Whether it starts to go into other
6 lawsuits or not, I'm waiting to see.

7 MR. WILSON: I have no intention of
8 asking -- I mean, I want to know what happened to
9 the money. That's what I want to know. And that's
10 what the next question is going to be. It's not
11 going to be questions that would go to the issues
12 that you've raised in the other lawsuit about
13 consent, duress, et cetera, et cetera, et cetera.
14 I've already asked him about that in the other
15 lawsuit.

16 MR. GREENE: Go ahead and pose your
17 question. I'll make my objection if I deem it fit.

18 MR. WILSON: All right, good.

19 Q. Can you tell me what did you do with
20 the \$518,000?

21 MR. GREENE: As to that, I will
22 object. It's irrelevant. It's beyond the scope of
23 the complaint. Complaint alleges that Armstrong
24 developed his so-called fraudulent scheme and the
25 intent to execute that in 1990. We're in 1986;

1 it's irrelevant.

2 MR. WILSON: I want to know what he
3 had in 1990 and --

4 MR. GREENE: Well, ask him.

5 MR. WILSON: Well, I can ask him
6 that or I can try to find out what he had in 1990
7 by going back prior to that.

8 MR. GREENE: I object on the grounds
9 stated.

10 MR. WILSON: Go ahead. I think you
11 can rule on it.

12 MR. BENZ: Okay. I'll sustain the
13 objection as to detailed questions as to what
14 happened to assets. Again, as to what he had at
15 the time of the so-called transfers, is fine. It's
16 certainly relevant. While this may be one approach
17 to it, it's also an invasion of privacy and I think
18 there are other ways to get there.

19 MR. WILSON: All right.

20 Q. Then let's just go to 1990, and why
21 don't you tell me what you had in 1990, what were
22 your assets in 1990?

23 A. Cash, stock, personal effects.

24 Q. All right. Well, thank you. Can
25 you tell me what how much cash did you have, let's

1 say January of 1990?

2 A. I have no recollection.

3 Q. None at all?

4 A. No, I had some.

5 Q. No. I mean you had no recollection
6 of how much you had?

7 A. That's correct.

8 Q. All right.

9 A. I mean other than what I've already
10 testified to.

11 Q. If I ask you how much cash you had
12 in January of 1990, you don't have any idea; is
13 that right?

14 A. Uh-huh.

15 MR. WILSON: All right. Then I
16 think I ought to be able to go back and ask him
17 what happened to the money because he doesn't
18 remember what he had in 1990.

19 THE WITNESS: I already told you
20 what happened, what happened to the money. I've
21 told you in detail. I've told you every, every
22 possible thing that you could possibly get. There
23 aren't, there isn't anything more than what you
24 have.

25 MR. WILSON: So now you're telling

1 me that the --

2 THE WITNESS: There it is.

3 MR. WILSON: The day of the
4 so-called fraudulent conveyances, August 1990.

5 THE WITNESS: You now know every
6 debt that I forgave. You know where all the stock
7 went. You have my declaration, which is a sworn
8 declaration which lays it out in such detail you
9 can't believe. Now give it your best shot, prove
10 your case. You haven't got a case.

11 BY MR. WILSON:

12 Q. Well, we'll be out of here a lot
13 sooner if you just answer whatever I ask you.

14 A. Don't ask so many questions. We
15 could leave right now.

16 Q. The questions that I asked you
17 previously, which you, and when you gave me the
18 list of people that owed you money, that's all as
19 of August of 1990; is that right?

20 A. Correct.

21 Q. All right. How long had those loans
22 been outstanding approximately, how long had the
23 loan to Jerry Solfvin been outstanding?

24 A. Could have been a year, I'm not
25 sure.

1 Q. And the one to Mr. Walton?
2 A. Couple of years.
3 Q. Okay.
4 A. Maybe three.
5 Q. Two or three years, would that be a
6 good estimate?
7 A. Uh-huh.
8 Q. And the one to the Dawsons?
9 A. Maybe a couple of years.
10 Q. And the one to the Douglasses?
11 A. I guess from -- although it changed
12 as we went through the property transfer matter,
13 there had been some, some debt which had existed
14 since '87.
15 Q. Okay. All right. Now, in August of
16 1990 what was your relationship with the Church of
17 Scientology, if any?
18 MR. GREENE: Objection, vague.
19 MR. WILSON: I don't think --
20 THE WITNESS: I was considered a
21 suppressive person, an enemy, fair game.
22 BY MR. WILSON:
23 Q. Okay. And that's your understanding
24 of how you were considered by the church; is that
25 right?

1 break?

2 THE WITNESS: Yes.

3 MR. WILSON: I guess we're taking a
4 break now.

5 (Recess taken.)

6 MR. WILSON: What was the last
7 question?

8 (Record read.)

9 THE WITNESS: Well, this was in the
10 beginning of August, and the crisis in the Middle
11 East began to develop and I sensed that it was a
12 very serious matter. And I guess really, inside
13 Scientology I was something of a -- for the
14 organization, I was something of a rebel inside and
15 I had begun to develop my own mind independent of
16 Scientology and began to think things through
17 myself.

18 And then when I left the
19 organization, I continued on in that direction and
20 I want, I guess I, you know, I've had a concern for
21 a long time about the state of the world. And I
22 also had begun to pursue a relationship with God.
23 And when this buildup began to happen and, you
24 know, I watched it like most of the people in this
25 country did on television day after day.

1 And being concerned, I asked what I
2 could do or what I should do, what was wanted of
3 me. I had already begun to understand the concept
4 of guidance and I had already, even prior to '86,
5 back in '84, I had considered that I could
6 communicate with God and that we had dialogue
7 sometimes and I was able to dialogue by writing.

8 And so at this time, as I sometimes
9 will do, I asked for guidance. And the message
10 that I got was to give everything away. Take only
11 what I need. And I didn't know what that really
12 meant in life at the time, but as I began to
13 meditate on that, I began to understand how that
14 really did apply to me. And it was at that time
15 that it came to me that I would forgive all the
16 debts that were owed to me and that I would take
17 only what I needed.

18 And I was at that time occupying the
19 house with Mr. Walton and I had a commitment to him
20 because I had, you know, essentially brought him up
21 to Marin County from Southern California. And I
22 had, I wanted to carry through on my commitment to
23 him and make good on that promise so that, that
24 really was why I ended up conveying the house to
25 him.

1 And I also was, as you know, the
2 owner of the, all the stock in my corporation at
3 that time which I had, I had developed some things.

4 But it really existed as a sort of a
5 future commercial hope at that time, and I had
6 transferred all of my writings and drawings and
7 stuff to the corporation in '88 and had maintained
8 it into this time in 1990. And I wanted to. That
9 was a major asset to me, and I thought at that time
10 that I would give that to four of my very good
11 friends in in the hope that they could or would do
12 with it whatever they wanted and it could be
13 commercially viable for all of them and a lot of
14 fun.

15 And so I didn't know about all the
16 details at the time, but I knew that, the broad
17 concept, and so I did, I went ahead on the basis of
18 that conviction that I could do something in life.

19 And then I did, as you know, I wrote
20 a series of articles or essays or letters regarding
21 the Middle East crisis as it built up. And being
22 unencumbered, I also offered, offered myself at
23 that time -- and this was something that, this was
24 not -- that aspect of it was not an original I had
25 at that time, because I had done the same thing

1 some years before. So it wasn't -- in a sense it
2 was, you know, precipitated by the Middle East
3 crisis and in a sense it was just a logical
4 progression and logical place that I came to after
5 everything else in my life had happened. And I
6 mean, there's no doubt in my mind that I have been,
7 I guess, both affected by my life with Scientology
8 and just who I am.

9 MR. WILSON: All right. Mark this,
10 would you please?

11 THE WITNESS: And I guess too, you
12 know, I really -- I think about things that -- and
13 you can probably know from the thought that I've
14 given money through the last many years, that I
15 recognize its intrinsic valuelessness. So that
16 was, you know, that had to kind of be in place in
17 order for everything else to happen.

18 But that's, that's an aspect of it.
19 And, you know, I have, I've not -- I really
20 believe, even though it's hard to see and although
21 sometimes it's difficult to continue to exist, I
22 think that all of my decisions along the way
23 evidence in fact guidance, and that I could not
24 have done it. I can't do this. I mean, I, you
25 guys beat me a long time ago.

1 MR. WILSON: Could you mark this,
2 please?

3 (Whereupon, Exhibit No. 1 was marked
4 for identification.)

5 MR. WILSON: Marked as Exhibit 1, I
6 only have two copies but I'll -- can you share one?

7 MR. WALTON: I'll look at his.

8 MR. WILSON: Can you share with
9 Gerry?

10 MR. GREENE: Fortunately, it's not
11 important.

12 MR. WILSON: It's not exactly a
13 major document here.

14 Q. Could you identify what's been
15 marked as Exhibit 1?

16 A. Yes.

17 Q. What is that please? Is that your
18 handwriting?

19 A. Yes.

20 Q. Okay.

21 A. And that was when, that's sometimes
22 how messages come to me and that's how that one
23 came to me and so it's a dialogue. Those are my
24 words. And of His words.

25 Q. By His words, you mean God's words?

1 A. Uh-uh.

2 Q. God's words are keep nothing, give
3 what you have to the poor and take only what you
4 need?

5 A. Yes.

6 Q. And so in giving away your assets,
7 you were following what God was telling you to do;
8 is that basically yes?

9 A. Uh-huh.

10 MR. GREENE: Please answer audibly,
11 Gerry.

12 MR. WILSON: And you shouldn't have
13 waived all those admonitions, Ford, and maybe he
14 wouldn't have done that.

15 Q. Now, so you basically kept nothing;
16 is that right?

17 A. Right.

18 Q. You gave everything to the poor?

19 A. Yes.

20 Q. So that means that you considered
21 Mr. Walton to be poor at the time?

22 A. Uh-huh. I, you know, that -- I,
23 myself asked that at the time, and when I looked
24 around at all of the people who were the recipients
25 of this, I saw that there wasn't any other way to

1 do it. That that was the logical way and that has
2 been borne out in truth.

3 Q. Did you --

4 A. Of people, a person should own where
5 he lives and that's where Michael Walton lives.
6 Michael Walton has a family now in that house, and
7 that's where the family should be.

8 Q. He didn't have a family then?

9 A. I don't live there.

10 Q. He didn't have a family then; is
11 that right?

12 A. Well, he, I mean he did, but --

13 Q. What was --

14 A. But the family had a somewhat
15 different configuration at this time.

16 Q. What was Mr. Walton's family in
17 1990?

18 MR. WALTON: I'm going to object to
19 that. I think it's irrelevant and I think it
20 invades my privacy. It has nothing to do with the
21 fraudulent transfers or allegations of fraudulent
22 transfers.

23 MR. WILSON: I'll withdraw that
24 question.

25 Q. What made you think that Mr. Walton

1 was poor in 1990?

2 A. Because he had a need and he was in
3 debt and he, in my opinion at the time, I think
4 that it was essentially a help. It took care of my
5 promise to him and it gave him the opportunity to
6 build a career from that point forward.

7 Q. Okay.

8 A. And to take care of his family. And
9 in truth, he really is the person who should be
10 there. I mean, I had a flash of it when I
11 considered initially buying the house, but I get
12 all sorts of flashes of things.

13 Q. Okay. Now let me just ask you in
14 addition to the house and the forgiveness of the
15 debt, what else did you give to Mr. Walton?

16 A. I think there were some, there were
17 some house things which I had owned individually.

18 Q. You mean that --

19 A. There was a table that was in the
20 house.

21 Q. Furniture?

22 A. Furniture, and that sort of thing.

23 Q. Was there a joint account you had
24 with Mr. Walton at that time?

25 A. Yes.

1 Q. And you gave what was in that to
2 Mr. Walton; is that right?

3 A. Correct.

4 Q. How much money was in that, as far
5 as you remember?

6 A. There may have been 35, \$40,000.
7 I'm not sure.

8 Q. And where was that joint account
9 maintained, what bank?

10 A. West American Bank.

11 Q. What branch?

12 A. San Anselmo.

13 Q. Okay. Did you give Mr. Walton
14 anything else that you haven't just told me about?

15 A. Share in the company, in the
16 corporation.

17 Q. Right, I'm sorry, I forgot that. In
18 addition to this, anything else?

19 A. No.

20 Q. So it was the house, whatever --
21 some furniture in the house, joint account, and one
22 share of TGAC?

23 MR. GREENE: And the debt.

24 MR. WILSON: And forgiving the debt.

25 THE WITNESS: Yes.

1 BY MR. WILSON:

2 Q. Is that right?

3 A. Uh-huh.

4 Q. Okay. Did you consider at the time
5 giving any of your assets to any charitable
6 organizations?

7 A. I considered.

8 Q. Why did you not give it to a
9 charitable organization, if there was a reason?

10 A. I wasn't guided to.

11 Q. When you say guided, you mean guided
12 by God; is that right?

13 A. Right.

14 Q. So you're -- essentially, you were
15 guided to give the assets by God to whatever you
16 gave it to; is that right?

17 A. Uh-huh.

18 MR. GREENE: You've got to say yes
19 or no.

20 MR. WALTON: Is that yes?

21 THE WITNESS: Yes.

22 BY MR. WILSON:

23 Q. Thank you. Now, in addition to --
24 we've already gone through some of this, and I
25 don't want to go through it again, I think I can do

1 it with just a couple of questions as to these
2 other people, the Dawsons, the Douglasses, and Jerry
3 Solfvin. When you forgave the debt, in your mind
4 that was giving away an asset; is that right?

5 A. Well, I didn't, I thought of it as
6 forgiving a debt.

7 Q. Okay.

8 A. So if that's -- I mean --

9 Q. Okay.

10 A. -- it's an asset, I suppose.

11 Q. Were you guided to do this as well?

12 A. Uh-huh.

13 Q. Okay.

14 MR. WALTON: Yes?

15 THE WITNESS: Yes.

16 BY MR. WILSON:

17 Q. For the same reasons that you've
18 just told us about for Mr. Walton; is that right?

19 A. Yes.

20 Q. Okay. In addition to forgiving the
21 debt, did you give Jerry Solfvin anything else?

22 A. No.

23 Q. In addition to forgiving the debt,
24 did you give the Douglasses anything else?

25 A. I got a share of the stock.

1 Q. In addition to that, did you give
2 them anything else?

3 A. I don't believe so.

4 Q. Okay. And the Dawson family in
5 Massachusetts, in addition to forgiving the debt,
6 did you give them anything else?

7 A. No.

8 Q. Okay. At the time of the, in August
9 of 1990, how would you characterize your
10 relationship with Mr. Walton?

11 A. We were friends and he also
12 represented me in the appeal in Armstrong 1. And
13 we had a prospective business relationship
14 regarding artistic or creative ventures.

15 Q. Okay. What was your relationship
16 with Michael Douglas in August of 1990?

17 A. Friends.

18 Q. That's it?

19 A. (Witness nods head.)

20 Q. And is Kim Douglas's wife?

21 A. Yes.

22 Q. They were just friends. How often
23 did you see them socially?

24 A. Maybe once a month.

25 Q. Okay. How about in August of 1990,

1 did you give Bambi Sparks anything?

2 A. Uh-huh.

3 Q. What did you give her?

4 A. I gave her a share of the
5 corporation and I gave her my car and I gave her
6 her home furnishings.

7 Q. Anything else?

8 A. Gave her some cash.

9 Q. How much cash did you give her?

10 A. I think it was like 1500 bucks or
11 something like that.

12 Q. What kind of car did you give her?

13 A. It's an '87 Toyota.

14 Q. All right. And what was your
15 relationship with her at the time, friends?

16 A. Friends.

17 Q. Did you use the car after you gave
18 it to her?

19 A. Uh-huh. We continued to hang out
20 together and she ended up not taking it but giving
21 it back.

22 Q. Then what did you do with it?

23 A. I still drive it.

24 Q. Okay. Who is Andrew Armstrong?

25 A. He's my brother.

1 Q. You gave him a share of stock in
2 TGAC?
3 A. No.
4 Q. Did you give him anything?
5 A. No.
6 Q. Did he ever buy stock in TGAC?
7 A. Yes. Oh, wait, no. He's -- you can
8 add him to that list, I guess.
9 Q. Which one?
10 A. He -- the list of people who owed
11 me.
12 Q. Okay.
13 A. Owed me money.
14 Q. How much did he owe you?
15 A. I think, I think it was 12,000.
16 Something like that.
17 Q. All right. And you forgave that
18 debt in August of 1990?
19 A. Right.
20 Q. All right. And where does he live?
21 A. Somewhere around Denver, Colorado.
22 Q. Okay. Who is Thomas McPherson?
23 A. He's a friend of mine.
24 Q. Does he own any shares in TGAC?
25 A. Yes.

1 Q. Did he buy those shares?
2 A. Yes.
3 Q. Did you give him anything in August
4 of 1990?
5 A. No.
6 Q. Did you give him anything before
7 August of 1990?
8 A. No.
9 Q. Did he ever owe you any money?
10 A. No.
11 Q. All right. Who is Michael Dick?
12 A. He's a friend of mine.
13 Q. He owns a share in TGAC?
14 A. Yes.
15 Q. Did he ever owe you any money?
16 A. No.
17 Q. Did you ever give him any assets?
18 A. No.
19 Q. All right. How about Trevor Dick?
20 A. That's a friend and he owns a share
21 of TGAC, he and his brother Colin.
22 Q. Okay. Now you're going to save me
23 some time. So did you ever, did he or his brother
24 Colin ever owe you any money?
25 A. No.

1 Q. Forgive or forget any obligations
2 they had to you?

3 A. No.

4 Q. Did you ever give them any of your
5 assets?

6 A. No.

7 Q. How about Anthony Armstrong; is he
8 your brother?

9 A. Yes.

10 Q. Did he ever owe you any money?

11 A. No.

12 Q. He owns a share of TGAC?

13 A. Yes.

14 Q. Did you ever give him any assets?

15 A. No.

16 Q. Okay. Now, can you tell me with
17 respect to TGAC what assets you gave to TGAC when
18 you gave them to them?

19 A. I gave, I gave the corporation my
20 writings, my drawings, up to 1988, and my office
21 equipment and that sort of stuff.

22 Q. Okay. Did they, did TGAC give you
23 anything in return for that?

24 A. They gave me a hundred percent
25 ownership.

1 Q. Of the corporation?

2 A. Right.

3 Q. All right. So you basically

4 transferred your assets or those assets to the

5 corporation and you got all the stock?

6 A. Right.

7 Q. And then eventually the stock ended

8 up with the people I've just asked you about, the

9 Armstrong -- McPherson, Michael Dick, Trevor Dick,

10 Colin Dick, Anthony Armstrong, the Douglasses and

11 Mr. Laff; (phonetic) is that right?

12 A. Well, I'm not sure what you mean by

13 eventually, but at one time the stock was owned

14 completely by Michael Walton, Michael Douglas,

15 Lorien Phippeny and Nancy Roads. Subsequently the

16 corporation sold some stock and subsequently, those

17 four majority shareholders gave back to me a

18 majority stock.

19 Q. So do you, how much of TGAC stock do

20 you hold today?

21 A. Eighty percent.

22 Q. And Lorien Phippeny owns no shares

23 today; is that right?

24 A. Correct.

25 Q. Who is she, by the way?

1 A. She's a friend.

2 Q. Okay. Did you give her any assets

3 in August of 1990?

4 A. I've already told you she's the same

5 as --

6 Q. That's Bambi Sparks?

7 A. Right.

8 Q. All right. Nancy Roads, did you

9 give her anything in August of 1990?

10 A. Those shares of sock.

11 Q. That's it?

12 A. Correct.

13 Q. Nothing else. And you reacquired

14 that 80 percent ownership of TGAC by gift from

15 those people that you mentioned; is that right?

16 A. Correct.

17 Q. And that's, did each of those

18 individuals, before giving it to you, own 20

19 percent; is that what it was?

20 A. Correct.

21 Q. Each owned one share?

22 A. Well, there was a stock split and

23 what was one share got divided up into a hundred.

24 Q. So --

25 A. And so they each own 25.

1 STATE OF CALIFORNIA)

2) SS

3 COUNTY OF SONOMA)

4

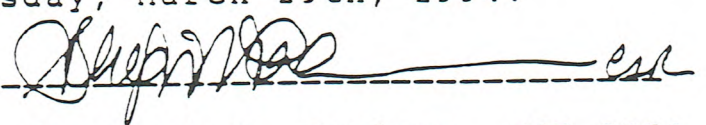
5 I, SHEENAGH M. CARLSON, holding CSR License
6 Number 8350, hereby certify that, pursuant to
7 Notice to take the foregoing deposition, said
8 witness was by me duly sworn to tell the truth, the
9 whole truth and nothing but the truth in the
10 within-entitled cause; that said deposition was
11 taken at the time and place stated herein; that the
12 testimony of the said witness was recorded by me by
13 stenotype, and that the said deposition was under
14 my direction thereafter reduced to computer
15 transcript and, when completed, was available to
16 said witness for signature before any Notary
17 Public,

18 I further certify that I am not of counsel or
19 attorney for either of the parties to said depositi
20 nor in any way interested in the outcome of the cau
21 named in the caption.

22 IN WITNESS WHEREOF, I have hereunto set my
23 hand this day of Tuesday, March 29th, 1994.

24

25


Sheenagh M. Carlson, CSR 8350
~~Certified Shorthand Reporter.~~

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF MARIN

3 --oOo--

4 CERTIFIED COPY

5 CHURCH OF SCIENTOLOGY
6 INTERNATIONAL, a California
7 not-for-profit religious
8 corporation,

9 Plaintiff,

10 vs.

11 No. 157 680

12 GERALD ARMSTRONG; MICHAEL
13 WALTON; THE GERALD ARMSTRONG
14 CORPORATION, a California
15 for-profit corporation;
16 DOES 1 through 100, inclusive,

17 Defendants.
18 -----/

19 DEPOSITION OF

20 MICHAEL L. WALTON
21 -----

22 FRIDAY, MARCH 18, 1994

23 202261

24 REPORTED BY: JOANNE M. FARRELL, CSR NO. 4838
25

1 can think of.

2 Q. Okay. At the time, beginning of
3 1990, had Mr. Armstrong loaned you any money?

4 A. Yes.

5 Q. How much was your debt to Mr.
6 Armstrong just prior to this house deal?

7 A. Something less than 30,000.

8 MR. GREENE: Excuse me, could you -- I'm a
9 little -- strike that.

10 It's unclear what the time frame is, so I'd
11 object on the basis of ambiguity.

12 MR. WILSON: Early 1990.

13 THE WITNESS: Somewhere just under \$30,000.
14 I had borrowed 30,000 -- I borrowed 25 and then
15 another 5, probably in 1987, '86, '87, something
16 like that, and had paid back not a lot of it, a
17 couple thousand dollars or something.

18 MR. WILSON: Q. Were these loans
19 evidenced by promissory notes?

20 A. One was.

21 Q. Which one?

22 A. The 25,000.

23 Q. Do you know where the copy of that
24 note is today?

202279

25 A. I know where the original is.

1 was certain things he was keeping.

2 The kind of mind Gerry has, it was really
3 well within keeping with how I recognize his mind
4 to work with respect to me, that he would give
5 away his interest in the house; that he would give
6 away the ladder -- no, I don't think he gave away
7 the ladder. I think the house fund, which was the
8 fund that I ended up controlling, had to purchase
9 the ladder from Gerry, but that --

10 Q. What is the "ladder"?

11 A. It's a ladder, you crawl up. \$300
12 ladder, \$400, I don't know how much it cost. But
13 that the kitchen table would stay with the house.
14 It was very compartmentalized and it explains why
15 Gerry wanted to be compensated for money that he
16 spent out of his own private account by the house
17 account.

18 The house account wasn't really -- I don't
19 want to speak for Gerry, but it was my impression,
20 my own impression; that Gerry had the impression
21 that the house account was neither his nor was it
22 really mine, it was the house's account, and it
23 was there to support the house for one year.

24 And when he relinquished control, that's
25 what happened, that house account did continue to

202287

1 support the house for a year, because that's what
2 it was for.

3 Q. Okay. So I take it that you didn't
4 really give him any legal advice with respect to
5 giving his assets away; is that right?

6 A. No, I didn't.

7 Q. And you first learned about his plan
8 to give away most of his assets sometime in the
9 summer of 1990; is that accurate?

10 A. Yes; July or August.

11 Q. And you learned about that because he
12 told you?

13 A. Yes.

14 Q. Was this something that he mentioned
15 before, or did this pretty much just come up in
16 the summer of 1990?

17 A. Giving away his assets?

18 Q. Yes.

19 A. It came up for the first time, as far
20 as I knew, in 1990, the summer, for me.

21 Q. And your first discussions about it
22 would have been that time frame; is that right?

23 A. Yes.

24 Q. Did he tell you that he wanted to
25 give all of his money to the poor? Did he ever

202286

1 make that statement to you?

2 A. Not that I recall.

3 Q. Okay. Did he ever tell you what his
4 intentions were with regard to this, why was he
5 doing it?

6 A. Yes, he did.

7 Q. What did he say?

8 A. He said a number of things to me.
9 I'm trying to separate what I know now from what
10 he said yesterday at the deposition from what he
11 specifically told me at that time. Basically,
12 that it was right to do; he was guided to do it.

13 And over the course of time, I think I told
14 you this last time you took my deposition, I
15 questioned him at some length when I determined
16 that he was really serious to try to find out what
17 was going on.

18 I have known Gerry to become especially
19 depressed during some of this Scientology
20 litigation over the past 15, 14 years, has it
21 been, 14 years, and quite frankly, when he told me
22 he was going to do this, I was afraid he was going
23 to kill himself.

24 So I questioned him at some length to make
25 sure that this was something that was a positive

202289

1 thing for him and not something that was a
2 negative thing. My initial response when he told
3 me was fear. I was afraid for Gerry.

4 Upon pressing, upon further conversations
5 over the course of, I suppose, about two weeks,
6 Gerry told me that it was really something that
7 had come to him from God. And when he told me, it
8 was a positive, pleasant experience that he seemed
9 to be portraying. I felt much comforted and after
10 that, I didn't ask him much more about it.

11 Q. Okay. What did he give you?

12 A. He gave me whatever interest he had
13 in the house at that time; he gave me a kitchen
14 table; and I'm not sure about the ladder.

15 Q. Okay. And what about the debt, did
16 he forgive the debt?

17 A. Forgave the debt.

18 Q. That was at that time?

19 A. Right.

20 Q. Were there any documents executed to
21 show the forgiveness of the debt?

22 A. Yes.

23 Q. What?

24 A. There was the return of the original
25 note with some forgiving language. I don't

202290

1 remember what the language was. It was basically
2 something prepared by the CPA.

3 Q. That's the note that you referred to
4 earlier that you have?

5 A. Yes.

6 Q. The \$25,000 note?

7 A. Yes.

8 Q. The \$5,000 debt was not evidenced by
9 a note?

10 A. No.

11 Q. He just told you he was going to
12 forgive that?

13 A. Yes.

14 Q. Was there any document that evidences
15 that forgiveness?

16 A. No.

17 Q. And he transferred to you, in
18 addition, the house account; is that right?

19 A. He transferred control. And I say
20 that sort of strangely because I had control,
21 anyway. Both of our names were on the account to
22 begin with; that was part of the deal. I was
23 fully entitled to write checks against the account
24 at any time. And the only thing he really did was
25 say he wasn't going to write anymore checks on the

202291

1 account.

2 Q. Okay. And then he wanted to be
3 repaid from that account for monies spent on the
4 house for certain specific items; is that right?

5 A. Yes.

6 Q. His rationale for that was he wanted
7 to do what?

8 A. I don't know what -- I mean, I don't
9 know what he was thinking about. But I wasn't
10 surprised.

11 Q. All right. Did you prepare any
12 documents? Did you prepare the forgiveness
13 document?

14 A. No.

15 Q. Did you prepare the deed from
16 yourself and Mr. Armstrong as co-tenants to
17 yourself with respect to the house?

18 A. I think I did.

19 Q. Did you prepare any other documents
20 to evidence the gifts that he was making to you?

21 A. Not that I recall.

22 Q. Did you ever tell Mr. Armstrong that
23 he should get a lawyer other than you to represent
24 him in these transactions?

25 MR. GREENE: Objection. That is

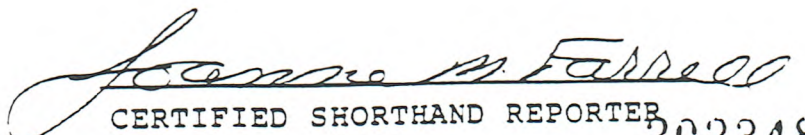
202292

CERTIFICATE OF REPORTER

I, the undersigned, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of said witness was reported by me, a Certified Shorthand Reporter and disinterested person, and was thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete and true record of said testimony; and that the witness was given an opportunity to read and, if necessary, correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the cause named in said action.

IN WITNESS WHEREOF, I have hereunder set my hand and affixed my signature this day of MAR 28 1994, 1994


CERTIFIED SHORTHAND REPORTER
STATE OF CALIFORNIA 202348

3-20-90

Dear Andy:

By this letter you and Marilyn are forgiven any debt of any kind you may have considered you owed me. I know it doesn't immediately charge things for you, but I hope it will bring you relief in some corner of your mind.

I still am planning to make my way to Colorado in mid September, so let me know if this works with your plans. I'd love to run your mountains.

I'll be leaving this

place soon, ^② although The
Gerald Armstrong Corporation
will continue to be
headquartered here, and
for now this will remain
my personal mailing address.
I hope to be in

B.C. around Labor Day.

I have a lot of
boxes don't I.

I also have a lot
of boxes and good
wishes for you guys.

Love

Gerry

3-20-80

Dear Lovie:

I'm not certain
what either you or
I consider you owe
me, but whatever
it is I am by
this letter forgiving it.

I was happy to
help you get your
sweet little car, and
happy to get all
those c-notes all
this while, which
always arrived exactly
when a hundred dollars
meant everything. And

happy to
among my
friends.

count you
dearest

Love
Gerry

-27-90

Dear Jerry:

The purpose of this letter is to forgive you of any indebtedness you consider you have to me.

I am aware that it was very difficult to make payments to me, and I am grateful for the payments you did make because they helped me as I hope to help you.

You and Sharon and all your family have always made me, and everyone, welcome in your home.

(2.)

Tal I was going to bed,
but now I'm going to
work.

Hallelujah!

Gerry

8-1-90

Dear Bruce, Tricia and
Anne-Leigh:

It is my desire to
forgive you by this letter
any debt you may con-
sider you owe me.

Please let me know if
in that regard you
want me to execute any
other document.

I was happy to help
you when I could, and
I know you were happy
to help me when you
could.

I hope I get to see
you all again. And

I hope you'll laugh.
Love to everyone!

Gerry

8-2-90
Dear Michael and Kimma:

With this letter
I am forgiving you any
indebtedness you may
consider you have to me.

You both have been
a great help to me
in many ways for many
years and I will be
eternally grateful.

The Whynot Group
can become a sole
proprietorship by ex-
ecution.

I will pick up
the few things I've
left at your home

and finish off the
few things I've left
undone, I hope, in
the next short time.

Love to you both.

Gerry

6838 Charing Cross Road
Berkeley, CA 94705

Thursday, September 6, 1990

Dear Gerry,

Hope this letter finds you back from your Canadian adventure, safe, sound, and of good cheer!

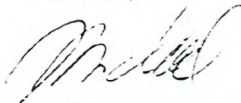
I wanted to write and thank you for what, viewed from one angle (as in: mine) is a stunning act of generosity--your having forgiven us for any indebtedness, and invested me as shareholder in TGAC. This follows on the heels of several acts of generosity which have been absolutely key factors in our financial situation being as happy as it is today. For all this, and the many other gifts you have bestowed upon us--chiefly your friendship--we too are eternally grateful. I am often mindful of your generosity as I meet with opportunities to lend a helping hand to other folks. There's no end, I guess.

As we discussed earlier, there is still some paperwork left to do in order to tie all the ends up to the satisfaction of the bureaucratic / legal world. This will be an opportunity (of which I hope there will be many) for us to get together one of these days.

I am in touch with Michael Walton concerning TGAC (I just realized yesterday that it's pronounced tee-gee-ack!) and am sure more history will be forthcoming on that front.

As to "finishing off the few things you've left undone", as far as I'm concerned, you can certainly stand down as concerns details on this Charing Cross house. If you'll just point out where you've left off on coating the decks with anti-rot goo, I'll be happy to take over on that and anything else around here.

Love,



Michael

Dear Gerry,

Thank you for your GREAT
Kindness it is truly wonderful
I wish you great Joy in your
Chosen PATH I hope it makes

you happy? you your closest
Dreams

I thank you for all the times
you listen to me and heard
me.

Life has some strange turns
to it. I see you at the PR
Desk in the Foreward Tween Deck,
getting married to Tour. AT
SHQ talking about getting the
Furniture Done. I see you with
Jassy at Jim's party in h. A
at the Bonheurtons in Court.
talking to you about Nane
you dancing at Laura's
wedding - So now where to.....

My house is your house in
all ways - may the gods take
care of you. May the
winds of time keep you safe

Love
Kurt

PROMISSORY NOTE

For value received, the undersigned promises to pay to Gerald David Armstrong the principal sum of \$29,245.53 (twenty-nine thousand two-hundred forty-five dollars and fifty-three cents).
Terms: The undersigned shall make principal and interest payments of \$29,245.53 on Gerald David Armstrong's behalf toward his half-portion of the \$159,600.00 trust deed and note secured by 7140 Buckingham Blvd, Oakland, California 94705 - this in addition to principal and interest payments on undersigned's half portion of the same trust deed and note (beneficiary of said trust deed and note is Fidelity Federal Savings and Loan Association.) Should Gerald David Armstrong and the undersigned agree mutually to sell the above mentioned real property, the undersigned agrees to pay Armstrong any remaining principal, out of escrow proceeds. The interest rate on this promissory note shall be the same rate as the above mentioned trust deed and note, which is a variable rate loan.

Michael E. Douglas
Michael Edward Douglas

7-28-87
date

Kima Elizabeth Douglas
Kima Elizabeth Douglas

7-28-87
date

*this debt
is on this date
forgiven as a
gift*

Aug 30 1990
[Signature]

PROMISSORY NOTE

For value received, the undersigned promise to pay to Gerald David Armstrong the principal sum of \$66,988.48 (sixty-six thousand, nine hundred eighty-eight dollars and forty-eight cents), in monthly installments of \$719.86, or more, principal and interest, at an annual interest rate of 10%. The note shall run from June 1, 1988, with the first payment due July 1, 1988, and the last payment due on or before June 1, 2003.

All parties hereto agree that this note supercedes and voids the previous note in the principal amount of \$29,245.53, dated July 28, 1987, in which Michael Edward Douglas and Kima Elizabeth Douglas were the payor, and Gerald David Armstrong was the payee.

Michael Edward Douglas 6-3-88
Michael Edward Douglas Date

Kima Elizabeth Douglas 6-3-88
Kima Elizabeth Douglas Date

Gerald David Armstrong Date

*this debt is on
this date forgiven
as a gift.
Aug 30 1990*

6-8-90



PROMISSORY NOTE

(STRAIGHT)

(INCLUDING ACCELERATION CLAUSE)

\$ \$10,000.00 Berkeley, California, June 1, 19 90
Six months after date, for value received
Michael E. Douglas and Kima E. Douglas

promise to pay to Gerald David Armstrong

or order at such place as holder may designate the sum of
Ten thousand Dollars Dollars
with interest from June 1, 1990 until paid, at the rate of
ten (10) percent per annum; payable ALL DUE AND PAYABLE DECEMBER 1, 1990

Should interest not be so paid it shall thereafter bear like interest as the principal. Should default be made in payment of interest when due the whole sum of principal and interest shall become immediately due, at the option of the holder of this note. Principal and interest payable in lawful money of the United States. If action be instituted on this note, I promise to pay such sum as the Court may fix as attorney's fees. This note is secured by a DEED OF TRUST.

This debt is or this note is forgiven as a gift. Aug 30, 1990

If the trustors shall sell, convey or alienate said property or any part thereof or any interest therein, or shall be divested of their title in any manner or way, whether voluntarily or involuntarily, any indebtedness or obligation secured hereby, irrespective of the maturity date expressed in any note evidencing the same, at the option of the holder hereof and without demand or notice, shall immediately become due and payable.

Michael E. Douglas
Kima Douglas

DO NOT DESTROY THIS NOTE: When paid, this note, with Deed of Trust securing same, must be surrendered to Trustee for cancellation, before reconveyance will be made.

NOTE SECURED BY DEED OF TRUST
(STRAIGHT NOTE)

\$66,988.48 Berkeley, California, June 1, 1988
Fifteen years after date,
for value received, Michael E. Douglas and Kima E. Douglas
promise to pay to Gerald David Armstrong
or order, at such place as holder may designate the sum of
Sixty-six thousand nine hundred eighty-eight and 48/100 DOLLARS
in Lawful Money of the United States, with interest thereon in like Lawful Money from June 1, 1988
until paid, at the rate of ten (10) per cent per annum, payable
\$719.86, principal plus interest, monthly.

Should interest not be so paid it shall thereafter bear like interest as the principal. Should default be made in payment of interest when due the whole sum of principal and interest shall become immediately due at the option of the holder of this note. If action be instituted on this note the undersigned promise to pay such sum as the Court may fix as attorney's fees. This note is secured by a Deed of Trust of even date herewith.

this debt is on this date forgiven as a gift Aug. 30, 1990

[Signature]
Michael E. Douglas
[Signature]
Kima E. Douglas

WESTERN TITLE GUARANTY COMPANY ALAMEDA COUNTY DIVISION

8 1990

En

SECOND DIST.

ED

8 1990

SON Clerk

Deputy Clerk

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Plaintiffs-Appellants,

v.

GERALD ARMSTRONG,

Defendant-Respondent

MARY SUE HUBBARD

Intervenor.

ORIGINAL

MAR - 9 1990

Permission to file
respondent's brief
GRANTED

Time to file respondent's
brief extended to 60 days
after date of this order.

[Signature]

3-22-90

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION THREE

)
) Case No. B025920
)
) LASC No. C420153
)
)
) RESPONDENT'S PETITION
) FOR PERMISSION TO FILE
) RESPONSE AND FOR AN
) EXTENSION OF TIME TO
) FILE RESPONSE

I am the respondent Gerald Armstrong. I am petitioning this court at this time for permission to file a respondent's brief in this appeal and for an extension of time in which to file a respondent's brief or other appropriate document.

1. Permission to File:

The unusual need for this court's permission to file a respondent's brief arises from a condition contained in a document entitled MUTUAL RELEASE OF ALL CLAIMS AND SETTLEMENT AGREEMENT signed by me December 6, 1986, a copy of which is attached hereto in a sealed envelope as Exhibit A. I have no objection to this document being unsealed.

Para. 4A of the settlement agreement allowed appellants to maintain their appeal, no. B005912, which had been filed in 1984, although the case

was ostensibly settled. Para. 4B contains the condition that I "waive any rights [I] may have to oppose (by responding brief or any other means) any further appeals taken by the Church of Scientology of California."

I have recently become convinced that it would be a fraud upon this court to not advise it that the respondent is prohibited from filing a brief. I am also now convinced that my right to file a respondent's brief is not something that can be taken away by such a settlement agreement.

I have discovered, moreover, that "the failure to file respondent's brief imposes an unnecessary burden on [the] court, and at least raises the inference that respondent concedes that the appeal is meritorious," Sowell v. Sowell, 164 Cal. App. 2d 371, 330 P.2d 391 (1958), Yarbrough v. Yarbrough, 144 Cal. App. 2d 610, 301 P. 2d 426 (1956); that the court "may assume . . . that the respondent has abandoned any attempt to support the judgment, and . . . may also assume that the points made by the appellant are meritorious," Roth v. Keene, 256 Cal. App. 2d 725, 64 Cal. Rptr. 399 (1967); and that the court "shall regard with disfavor the failure of a respondent in any case to assist the court by means of an answering brief," James v. James, 125 Cal. App. 2d, 417, 270 P.2d, 538 (1954).

I am therefore requesting this court's permission to file a respondent's brief, motion for dismissal or other responsive document.

2. Extension of Time to File:

I received Appellants' Brief and Appellants' Supplemental Appendix in Lieu of Clerk's Transcript from Flynn, Sheridan & Tabb on January 18, 1990. I have not yet received Appellants' Appendix.

I am not an attorney and I am not represented by legal counsel in any Scientology matters at this time. Neither Flynn, Sheridan & Tabb nor Contos & Bunch, both of which firms represented me throughout the litigation of

this case in the lower court, will be representing me in this appeal. It is my intention to retain an attorney to represent me in this appeal if at all possible.

Appellants had five and a half years from the date the trial court issued its Decision to the date they filed their brief.

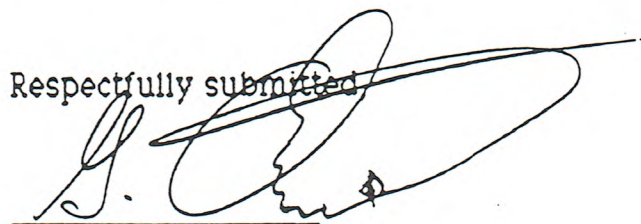
Appellants have filed another appeal, entitled Church of Scientology of California and Mary Sue Hubbard, Appellants, against Gerald Armstrong, Defendant, Bent Corydon, Appellee, Civ. No. B 038975 in Division Four in the Second Appellate District, which has its genesis in the same case underlying this appeal, Super. Ct. No. C420153, and concerns many of the same facts and issues as this appeal. I am at this time also petitioning the Division Four Court for permission to respond in that appeal.

There remain a number of issues springing from the settlement agreement, appellants' actions in violation of the agreement, and appellants' obstructive and threatening use of the agreement, which this court does not have to consider in order to grant my petition, but which I will be addressing as soon as possible by motion or other appropriate action in the Los Angeles Superior Court, which retains, pursuant to clause 20 of the settlement agreement, jurisdiction to enforce its terms.

I therefore request 90 days from the date of this court's granting of this petition in which to file a respondent's brief or other responsive document.

DATED: February 20, 1990

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read 'G. Armstrong', is written over the words 'Respectfully submitted,'.

GERALD ARMSTRONG

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF ALAMEDA)

I am employed in the County of Alameda, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 7140 Buckingham Blvd., Berkeley, CA 90475.

On February 20, 1990 I caused to be served the foregoing document described as RESPONDENT'S PETITION TO FILE RESPONSE AND FOR AN EXTENSION OF TIME TO FILE RESPONSE on interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Oakland, California, addressed to the persons and addresses specified on the service list attached.

Executed on February 20, 1990 at Oakland, California.

SERVICE LIST

COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
DIVISION THREE
3580 Wilshire Blvd., Room 301
Los Angeles, California 90010

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CLERK OF THE SUPERIOR COURT
111 North Hill Street
Los Angeles, California 90012

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL
WALTON; THE GERALD ARMSTRONG
CORPORATION, a California for
profit corporation; DOES 1
through 100, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

COPY

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Monday, July 11, 1994

VOLUME I

Reported by:
PENNY L. GILMORE
CSR NO. 4724

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

1 Q. How long have you been secretary?

2 A. June 1988.

3 Q. Have you held any other position in the
4 organization? When I say "the organization," I'm talking
5 about the organization that filed the lawsuit in this
6 litigation. Do you understand that?

7 A. Yes, I do.

8 Prior to my becoming secretary of the
9 corporation for the Church of Scientology International I
10 was an employee for approximately four years.

11 Q. Did your position as an employee involve you
12 having any kind of title?

13 A. Yes.

14 Q. What were your titles starting from the first
15 and progressing until the last?

16 A. The entire time I'm been with the Church of
17 Scientology International I've worked in the legal
18 department. I've had various job titles, some of which I
19 don't remember, but they're all in the area of litigation
20 working in either a paralegal capacity or as an executive
21 over the department in which the paralegals work.

22 Q. How big is that department?

23 MR. MOXON: Objection. Which department?

24 MR. WALTON: The legal department.

25 MR. MOXON: Objection as to time. Now?

1 MR. WALTON: Q. What's the biggest it has been
2 since you have worked in it? What's the maximum number of
3 people in that department from the time you worked in it
4 until now?

5 A. Approximately 50.

6 Q. Does that include lawyers?

7 A. No.

8 Q. What's the smallest that it's been?

9 MR. MOXON: I object to relevance. Is there
10 some point as to how large or small the department is?

11 MR. WALTON: I think it may relate to the amount
12 of experience that this witness has. This witness is here
13 on behalf of the plaintiff and I'm going to be asking a
14 lot of questions. I need to know if he's qualified. I'm
15 looking at what his qualifications are.

16 MR. MOXON: Is there a particular qualification
17 you are interested in?

18 MR. WALTON: I want to know what his experience
19 is.

20 MR. MOXON: How large or how small the
21 department is is irrelevant to how much experience he has.

22 MR. WALTON: I don't think so. I think if he's
23 been working with 50 people, for example, he's been number
24 two in charge of 50 people, that would indicate a lot of
25 experience than if he's been working with one person and

1 he's been the second in command.

2 Can we have a ruling?

3 MR. BENZ: I'm going to allow the question as to
4 background.

5 THE WITNESS: Four.

6 MR. WALTON: Q. At the present time how large
7 is it, just approximately?

8 A. Approximately 25 to 30.

9 Q. Do you have direct control, management control
10 over any of these people?

11 A. Yes.

12 Q. How many?

13 A. Three.

14 Q. To whom do you answer? Who is your supervisor?

15 A. You want his name, is that what you are asking?

16 Q. Yes.

17 A. Ed Parkin, P-A-R-K-I-N.

18 Q. What is Mr. Parkin's title?

19 A. Legal activities chief.

20 Q. Mr. Farny, how many times have you had your
21 deposition taken?

22 A. At least a dozen, but I'm not certain how many
23 times.

24 Q. How many of those times in relationship to some
25 Scientology litigation?

1 CERTIFICATE OF DEPOSITION OFFICER

2
3 I, PENNY L. GILMORE, duly authorized to
4 administer oaths pursuant to Section 8211 of the
5 California Code of Civil Procedure, do hereby certify
6 that LYNN ROBERT FARNY, the witness in the foregoing
7 deposition, was by me duly sworn to testify the truth, the
8 whole truth and nothing but the truth in the
9 within-entitled cause; that said deposition was taken at
10 the time and place herein stated, that the testimony of
11 said witness was reported by me, a Certified Shorthand
12 Reporter and a disinterested person, and was thereafter
13 transcribed into computer-assisted transcription under my
14 direction.

15 I futher certify that I am not of counsel or
16 attorney for either or any of the parties in the foregoing
17 depositeon and caption named, nor in any way interested in
18 the outcome of the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand
20 this 6th day of August 1994.

21
22
23 I hereby certify this copy is a
24 true and exact copy of the
25 Original.

Penny L. Gilmore
DEPOSITION OFFICER, CSR NO. 4724

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL
WALTON; THE GERALD ARMSTRONG
CORPORATION, a California for
profit corporation; DOES 1
through 100, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

COPY

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Tuesday, July 12, 1994

VOLUME II

Reported by:
PENNY L. GILMORE
CSR NO. 4724

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

1 A. Certainly.

2 Q. What was that?

3 A. I had an ecclesiastical position; I didn't have
4 any corporate position. I worked in the legal department
5 since 1984.

6 Q. When you refer to your working in the legal
7 department from '84 to '88 as holding an ecclesiastical
8 position, would you define for me what you mean by your
9 use of the term "ecclesiastic"?

10 A. A position that derives from -- sorry, that
11 derives its authority, if you will, from the ecclesiastic
12 organization of the Church as opposed to the corporate
13 organization of the Church. The corporation as a
14 corporation is organized with directors and officers;
15 ecclesiastically we're organized otherwise.

16 Q. So the ecclesiastical organization is separate
17 and distinct and apart from the corporate organization?

18 A. Except to the degree --

19 Q. First if you can agree give me a yes-or-no
20 answer?

21 MS. BARTILSON: I'm going to object and ask you
22 to let him finish answering the question before you
23 interrupt. I think that was the ground rules yesterday.

24 THE WITNESS: Except to the degree of this --
25 and the answer is not going to offend you -- the people

1 that occupy the corporate positions occupy similar
2 ecclesiastic positions, so there's some relationship to
3 it.

4 MR. GREENE: Q. Again, my question is that the
5 ecclesiastical organization exists separate and apart from
6 the corporate organization?

7 MS. BARTILSON: Objection, asked and answered.
8 Answer it again.

9 THE WITNESS: Obviously you are dealing with the
10 same group of people. There are parallel -- I think a
11 better way of expressing it, there are parallel
12 ecclesiastical and corporate organizations that are
13 separate, but the part in the question I'm having
14 difficulty with is "distinct." You are talking about the
15 same Church. In other words, the Church of Scientology
16 International is organized in an ecclesiastical fashion,
17 and within those ecclesiastical positions certain
18 individuals occupy corporate positions. To that degree
19 they are separate, yes, but you are talking about the same
20 entity.

21 Q. We're talking about CSI.

22 A. That's right.

23 Q. That's the corporation.

24 A. Mm-hmm.

25 Q. That's one subject matter that we're discussing.

1 A. Right.

2 Q. The other subject matter we're discussing is the
3 subject matter of ecclesiastical authority.

4 A. Right.

5 Q. And there's commonalities between CSI and
6 ecclesiasticalness but they're not identical, are they?

7 MS. BARTILSON: Objection, vague and ambiguous.

8 THE WITNESS: I don't exactly understand your
9 question.

10 MR. GREENE: Q. Let me try to make it more
11 clear.

12 A. Try it again.

13 Q. Yesterday, if my recollection is right, your
14 testimony was that there are approximately 1400
15 Scientology-related organizations, right?

16 A. Yes, churches, missions and groups.

17 MR. WALTON: What?

18 THE WITNESS: Churches, missions and groups.

19 MR. WALTON: Am I the only one down here not
20 hearing well?

21 MR. BENZ: I missed it the first time. I heard
22 it the second time.

23 MR. GREENE: Q. So of those 1400 churches,
24 missions and groups, CSI is one, correct?

25 A. That's also correct.

1 Q. Now isn't it true that there is ecclesiastical
2 authority in place in each of those 1400 groups, if you
3 know?

4 A. Ecclesiastical authority in place in each?

5 Q. Yes.

6 A. Each as its own separate unit or among them?
7 That's what I don't understand about your question. I
8 think it's largely irrelevant, though, because the answer
9 is yes to both questions. I want to make sure which of
10 those two questions you are asking.

11 Q. I'll keep asking my questions and we'll do our
12 best to wend our way through this.

13 Where officers, directors and trustees of CSI
14 have authority, that's defined according to the articles
15 in the bylaws of CSI?

16 A. Right.

17 Q. They are also subject to authority that's
18 derived from an ecclesiastical source, right?

19 A. Okay, I'll go along with that. All right.

20 Q. And the ecclesiastical source is the scripture
21 of the Scientology religion; isn't that right?

22 A. That's also correct.

23 Q. And the scripture of the Scientology religion in
24 part is derived from the writings of L. Ron Hubbard?

25 A. Correct. I would object to your

1 characterization of "in part." It is derived from the
2 written and recorded spoken words of L. Ron Hubbard on the
3 subjects of Dianetics and Scientology.

4 Q. Entirely?

5 A. Yes.

6 Q. So then is an accurate definition of your
7 understanding of the use of the term scripture as used in
8 Scientology, to define scripture as being the totality of
9 the written -- of the writings and recordings of L. Ron
10 Hubbard?

11 MS. BARTILSON: Objection, misstates the
12 witness's testimony.

13 MR. GREENE: I'm asking if that's accurate.

14 THE WITNESS: No, that's not accurate.

15 MR. GREENE: Q. Then I misunderstood what you
16 said. Tell me again. I'm sorry.

17 A. Scriptures of the Scientology religion are
18 comprised of written and recorded words of L. Ron Hubbard
19 on the subject of Dianetics and Scientology with the
20 allowance that they may have been cancelled over the years
21 or revised or modified, or whatever. On the subject of
22 Dianetics and Scientology, what I had told you in the
23 first answer was given allowances for any cancellations or
24 revisions that may have been done over the years.

25 Q. That's part of -- Let me get a bigger picture

1 first before I go more narrowly.

2 When you make the qualification on the subjects
3 of Scientology and Dianetics, does that include writings
4 on organizational administration?

5 A. That would not be included in the exception.

6 Q. I'm not focused on the exception; I'm focused on
7 the scope of the meaning of scripture. So my question is
8 is it included within the scope of the meaning of
9 scripture L. Ron Hubbard's writings on administrative
10 management?

11 A. Certainly, as it's used in the Church and as
12 it's used in the Organization Executive Courses, First
13 Volume, certainly that's considered scripture.

14 Q. You are a Scientology executive yourself; is
15 that right?

16 A. That's correct.

17 Q. So you have gone through and received some
18 amount of training in the organization executive courses,
19 right?

20 A. Yes.

21 Q. Would you tell me what the extent of your
22 training in that regard has been?

23 A. I've done the entire Organization Executive
24 Course, which is the study of the encyclopedic volumes of
25 Church policy as well as the Flag Executive Briefing

1 Course.

2 Q. And the OEC, Organization Executive Course
3 books, those are the green ones?

4 A. That's correct.

5 Q. Now directing your attention to what's Bates-
6 stamped as page 13 there's the enumeration of what the
7 Mother Church has got to adhere to and there's a list of
8 three items.

9 A. Yes.

10 Q. So part of what CSI's corporate mandate is is to
11 adhere to the goals, tenets, doctrines, codes, creed,
12 policies and practices set forth in the Scientology
13 scriptures, right?

14 A. That's correct.

15 Q. And you yourself as an individual Scientology
16 executive are bound by such things as well, correct?

17 A. Certainly in the performance of my duties, yes,
18 of course.

19 Q. And also in the performance of -- I mean, you
20 have given your life to Scientology, essentially, haven't
21 you?

22 A. I've devoted my life to it, yeah. I think we're
23 getting into the area of personal religious experience
24 that's been excluded, but, yes, of course I have.

25 Q. That's been roughly since 1976, right?

1 A. Roughly.

2 Q. Now item two talks about recognition of the
3 ecclesiastical authority of the hierarchy of the Mother
4 Church, right?

5 A. That is what it says.

6 Q. Now making reference to the ecclesiastical
7 authority that means, if I have understood you -- and I
8 may not and I know you will correct me if I haven't --
9 that recognition is of the Scientology scriptures, right?

10 A. To be precise, the recognition is of the
11 ecclesiastical authority of the hierarchy of the Mother
12 Church but it flows, that authority flows from the
13 scriptures, if that's what you are asking.

14 Q. That's a good starting point. Then the next
15 point I want to go to is the phrase "hierarchy of the
16 Mother Church." My first question is: The hierarchy to
17 which that phrase makes reference, is that hierarchy
18 contained within CSI?

19 A. That appears to be the most logical reading of
20 point two, yeah.

21 Q. Let me ask you -- I know that it appears to be
22 the reading --

23 A. It would --

24 Q. It appears that way to me, too.

25 A. It would match the way things work. So the

1 Q. And in some cases physically?

2 A. I don't recall receiving a physical order, but
3 you are correct that orders can be issued that way.

4 Q. That's the scope of my universe. Is that the
5 same as yours?

6 A. Ditto.

7 Q. So, then, when you receive an order, for such an
8 order to be pursuant to policy that order has got to be in
9 writing, doesn't it?

10 A. Policy contemplates the existence of verbal
11 orders, so the answer to your question is no.

12 Q. Was the entire legal division of OSA affected by
13 the reorganization?

14 A. Yes.

15 Q. How many people was that, approximately?

16 A. Thirty to 40.

17 Q. Now the action bureau of OSA contemplates the
18 performance of what type of activities?

19 A. Sending representatives to local areas to assist
20 them to resolve situations in that area either internally
21 within the local Office of Special Affairs or Department
22 of Special Affairs or externally.

23 Q. When such persons were sent out would that be
24 called a mission?

25 A. It would.

1 Q. Would such persons performing such missions
2 generally be members of the CMO?

3 A. No.

4 Q. Did you hold the post of civil litigation
5 officer within OSA during the original Armstrong
6 litigation?

7 A. You mean in 1984?

8 Q. That was when --

9 A. 1982 to 1984?

10 Q. Yes, '82 to '84.

11 A. No, I did not.

12 Q. Were you involved in the Armstrong litigation --
13 Actually, strike that.

14 What post did you hold in the '82 to '84 time
15 period, post or posts?

16 A. It's plural. When the case was first filed and
17 we obtained the temporary restraining order --

18 Q. Wait, wait, wait, I want --

19 A. I have to do it by what was happening. Do you
20 want to do it by date?

21 Q. No, you can give me activity and sequence.

22 A. When the litigation was first filed I was in
23 supercargo of the Office of Special Affairs, U.S.

24 MR. WALTON: I'm sorry, what?

25 THE WITNESS: Supercargo.

1 MR. GREENE: Q. That was your post?

2 A. Yes.

3 Q. So then what post next did you have?

4 A. Then August '82, August '82 I was on that
5 position. I'm not sure -- no, it wasn't OCS; that was
6 before the reorg was completed. It was U.S. Guardian's
7 Office.

8 Q. So you were supercargo of the U.S. Guardian's
9 Office in approximately August of '82?

10 A. That's correct. Then after the reorg I went
11 into legal. That would have been January of '83 I went
12 into legal in the mission all clear, and I held various
13 positions within that until I moved up to the Office of
14 Special Affairs International in approximately April of
15 '84. My position was called litigation secretary. I was
16 the head of what is now the Legal Bureau. At that time it
17 was the Litigation Bureau.

18 Q. So you were litigation secretary up through June
19 of '84 when Breckenridge's decision came out?

20 A. Yes.

21 Q. Then were you civil litigation officer?

22 A. No.

23 Q. What was next?

24 A. Next was deputy litigation chief for the United
25 States; then was litigation chief. I'm not sure it was

1 chief. No, it wasn't chief, it was director of both of
2 those. Then I was the All Clear legal secretary. My next
3 post in legal was litigation chief, legal aide.

4 Q. Legal aide is a different post?

5 A. It's different.

6 Q. I just want to make sure I'm clear.

7 A. Legal quality control officer and then civil
8 litigation officer.

9 Q. And all of these positions were all positions
10 within the ecclesiastical authority of CSI, right?

11 A. Not all that I listed.

12 Q. Let me go through them and check them off and
13 then you can tell me.

14 A. You want me just to tell you where the ones
15 within CSI start?

16 Q. Sure.

17 A. Litigation secretary, all the ones thereafter.

18 Q. Those were ecclesiastical positions?

19 A. No, all the ones from that one onward was within
20 CSI. The ones previously were CSC, Church of Scientology
21 California.

22 Q. So when you were supercargo USGO, that was
23 within CSC?

24 A. That's right.

25 Q. Then you made reference to the reorganization

1 and that's what has been called in the past "mission
2 corporate category sort-out"?

3 A. No.

4 Q. That's a different reorganization?

5 A. Mission corporate sort-out didn't result in a
6 reorganization; it was abandoned. It was a complete
7 failure.

8 Q. The reorganization, then, to which you were
9 making reference was the reorganization that resulted, at
10 least in part, with the origination of CSI, RTC, Religious
11 Technology Center, and CST, Church of Spiritual
12 Technology, right?

13 A. In part. It began approximately in the summer
14 of 1981 and was complete with a total disbandment of the
15 Guardian's Office by October of '83.

16 Q. Now the list that you gave me of litigation
17 secretary on, those all were within OSA, right?

18 A. That's correct.

19 Q. And OSA is an ecclesiastical organization,
20 right?

21 A. The Office of Special Affairs International.

22 Q. Right.

23 A. What we've been calling OSA.

24 Q. Yes. Just so we're clear, there's a difference
25 between the Office of Special Affairs and Office of

1 Special Affairs International, isn't there?

2 A. Yes.

3 Q. So when you and I have been talking here saying
4 the words or the letters OSA, what my understanding has
5 been is we've been referring to the international
6 organization; is that the same as what yours has been?

7 A. I don't think I've used it any other way.

8 Q. I don't think you have either. I just want to
9 make sure we're clear.

10 A. Yes.

11 Q. So with all that in mind, going back to Bates-
12 stamped page 13 of Exhibit three, when you are talking
13 about items two and three there and references made to
14 ecclesiastical authority and governance in ecclesiastical
15 matters by said hierarchy, what we're talking about is OSA
16 International, right?

17 A. Not exclusively, no.

18 Q. But in part?

19 A. Small part certainly, but we're not the main
20 line of ecclesiastical management of the religion; we're a
21 small portion of that that deals with external matters
22 such as this lawsuit. So we're not by any stretch of the
23 imagination the mainline of activity of the Church.

24 Q. Right. I'm not meaning to suggest that you are.

25 A. Within those confines, fine.

1 what was done. Now, then, its subsequent importance to
2 history will determine whether or not such things are
3 kept, but within those guidelines.

4 MR. GREENE: I would like to mark as Defendant's
5 six a one-page document that's an HCO policy letter that
6 was reissued on 12 of April 1983.

7 (Whereupon Defendant's Exhibit 6
8 was marked for identification.)

9 MR. GREENE: Q. Directing your attention to
10 Defendant's Exhibit six, do you recognize that document?

11 A. Let me read it first.

12 Q. Sure.

13 A. All right, I've read it

14 Q. Have you seen this document before?

15 A. Yes. Absent the Bates stamp.

16 Q. The title of this document is Verbal Tech:
17 Penalties, right?

18 A. Yes.

19 Q. Has this policy letter, to your knowledge, ever
20 been rescinded?

21 A. Not to my knowledge.

22 Q. As a Scientology executive is this policy letter
23 something that you would do your best to comply with?

24 A. I would do my best to adhere to it, yes,
25 especially since the second paragraph really exemplifies

1 what we're talking about in term of standard technology.
2 The materials of Scientology are contained in the
3 materials and that's the best reference for them.

4 Q. Then the first paragraph where it says, "Any
5 person found to be using verbal tech shall be subjected to
6 a court of ethics." You know what a court of ethics is,
7 right?

8 A. That's right.

9 Q. A court of ethics is a particular procedure
10 within Scientology; is that right?

11 A. That's right.

12 Q. Part of Scientology has to do with a realm of
13 practice that is known as ethics, right?

14 A. Realm of practice?

15 Q. Part of Scientology practice has to do with
16 ethics, right?

17 A. Yes.

18 Q. And ethics has got a very specific meaning
19 within Scientology, right?

20 A. Yes.

21 Q. As a general principle if an individual is
22 having difficulty within Scientology it's because in
23 Scientology parlance his or her ethics are out, right?

24 MS. BARTILSON: I'm going to object.

25 THE WITNESS: I wouldn't adopt that as a general

1 principle, no. I would not adopt that as a general
2 principle and you are right, we are getting --

3 MS. BARTILSON: We are really getting far afield
4 here and I don't see any relevance to this. General
5 practice of Scientology is exactly what he said it is.

6 MR. GREENE: We'll come back to it and it is
7 quite relevant. I'll lay a better foundation.

8 MR. BENZ: I think the question has been
9 answered.

10 THE WITNESS: It has been. I couldn't let the
11 misstatement of it stand.

12 MR. BENZ: That's fine. So no ruling is
13 required at this point, is what I'm saying.

14 MR. GREENE: Q. In fact, Exhibit number six has
15 specifically been adopted by CSI, right?

16 A. That's what it says.

17 Q. To your knowledge, that's the truth, isn't it?

18 A. Yes, to my knowledge that's the truth.

19 MR. GREENE: I'd like to mark as Defendant's
20 seven the HCO policy letter of 5 March '65.

21 (Whereupon Defendant's Exhibit 7
22 was marked for identification.)

23 MR. GREENE: Q. Directing your attention to
24 seven and immediately to the obscured part --

25 A. Sorry, I didn't hear you.

1 Q. I want to direct your attention to the obscured
2 part.

3 A. Okay.

4 Q. When you focus you can read the words, although
5 they're not as easy to read as the rest of it. On page
6 one there of Exhibit seven the part that's been obscured,
7 as I see it it says, quote, "The sense in which we use
8 policy is the rules and administrative formulas by which
9 we agree on action and conduct our affairs," close quote.

10 A. Yes, that's what it looks like to me.

11 MS. BARTILSON: Do you have the original?

12 THE WITNESS: Mine is a generation earlier.
13 Just for the record, the one handed Laurie was a couple of
14 generations beyond that and couldn't be read.

15 MR. GREENE: Q. Do you have the original? Take
16 a look at the original and satisfy yourself that Exhibit
17 seven is --

18 MS. BARTILSON: See if it matches because
19 there's junk all over it.

20 THE WITNESS: What am I supposed to match, this
21 sentence?

22 MR. GREENE: Q. Just the document. You asked
23 earlier if you could take a look at the green volume to be
24 able to compare the exhibits.

25 A. Okay, fine. All right, it appears to match.

1 Q. All right. Exhibit seven, like all the other
2 policy letters, as a Scientologist the expectation is to
3 adhere to what is expressed in the policy letters, right?

4 A. Well, what is expressed in here in terms of the
5 timeless nature would be adhered to, yes, like the general
6 laws given up at the top. But, of course, one cannot
7 continue to adhere to his description at the time he wrote
8 it of the international board being composed of 336.

9 Q. Because that doesn't exist anymore.

10 A. Right.

11 Q. Of course not.

12 A. But the general laws and definitions of terms
13 that are given here, yes.

14 Q. Which would include the definition here of a
15 policy letter right underneath the obscured part?

16 A. I think -- oh, underneath, not in back of. "One
17 which contains one or more policies and their explanation
18 and application." Yes, correct.

19 Q. Now aside from any organizational inaccuracies
20 that are set forth in Exhibit seven --

21 A. Organizational antiquities. They were accurate
22 at the time.

23 Q. Aside from those things you would adhere to and
24 comply with what's expressed in Exhibit seven, right?

25 A. Yes, aside from any organizational antiquities

1 that have since been revised.

2 My watch shows quarter to.

3 Q. I have just one more, so let's do it.

4 Defendant's Exhibit eight is an HCO Policy Letter of 9
5 August 72.

6 (Whereupon Defendant's Exhibit 8
7 was marked for identification.)

8 THE WITNESS: All right, I've read it.

9 MR. GREENE: Q. Has Exhibit eight been
10 rescinded -- excuse me, strike that.

11 Do you recognize Exhibit eight?

12 A. Yes.

13 Q. Is that a current policy letter that's currently
14 adhered to in Scientology according to your best
15 knowledge?

16 A. Generally, yes, although the organizational
17 entities referred to in the fifth paragraph have different
18 names.

19 Q. That is the International Board Members?

20 A. I was thinking of the Authority and Verification
21 Unit as the Authorization and Verification Unit.

22 Q. Now it's known as that?

23 A. Yes.

24 Q. What about the International Board members?

25 A. That would apply to CSI at present.

1 Q. What portion of CSI would that apply to?

2 A. The board members.

3 Q. So, then, in your practice as a Scientology
4 executive you adhere to what's set forth in Exhibit eight,
5 right?

6 A. Yes, I take the information from HCOBs and HCO
7 PLs to be senior to other types of policy directors. It's
8 a matter of interpretation of them.

9 Q. Okay, great. Let's break for lunch.

10 (Whereupon the deposition was adjourned
11 for lunch.)

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1 A. As you wish.

2 MR. GREENE: I want to mark as Defendant's nine
3 an HCO policy letter of 25 November 1970 corrected and
4 reissued 27 November 1970. Let the reporter mark it
5 first.

6 (Whereupon Defendant's Exhibit 9
7 was marked for identification.)

8 MR. GREENE: Q. Would you take a few moments
9 and read Exhibit number nine, which is a four-page
10 document?

11 Actually, rather than have you read every word,
12 can you tell whether or not you recognize it first?

13 MS. BARTILSON: I'm going to object and ask the
14 witness be allowed to review the document before he can
15 say if he recognizes it or not. It's a four-page
16 document. It shouldn't take very long to look at it.

17 THE WITNESS: It appears to be a 1986
18 publication of this policy letter, again with the same
19 caveat as before.

20 Do you want me to continue reading or is there a
21 part you want me to focus on specifically?

22 MR. GREENE: Q. Let me focus on the third page
23 at the top says, quote, "An order is the direction or
24 command issued by an authorized person to a person or
25 group within the sphere of the authorized person's

1 authority," close quote.

2 A. Okay, I've read that.

3 Q. That principle applies currently within CSC,
4 does it not, or CSI, excuse me?

5 A. Certainly the principle applies as a matter of
6 the command channel's specific function of a senior post
7 and junior post such to be totally accurate, but certainly
8 the principle applies.

9 Q. Then the next sentence where it says, quote, "By
10 implication an order goes from senior to juniors," close
11 quote, that general principle is applicable currently in
12 CSI, right?

13 A. Of course.

14 Q. Now you know an individual named Norman Starkey,
15 don't you?

16 A. Yes.

17 Q. What is Norman Starkey's post?

18 A. He's the executive director of Author Services
19 Incorporated, which is Mr. Hubbard's literary agency.
20 He's the trustee of Mr. Hubbard's estate. Sorry, I did
21 that wrong. Trustee of his trust and executor of his
22 estate.

23 Q. To your knowledge, is David Miscavige senior to
24 Mr. Starkey?

25 A. In what way?

1 MR. GREENE: Q. I would like to mark Exhibit
2 12, which is a packet of documents that's entitled
3 Suppressive Acts, Suppression of Scientology and
4 Scientologists, HCO Policy Letter of 23 December 1965,
5 revised 8 January '91.

6 (Whereupon Defendant's Exhibit 12
7 was marked for identification.)

8 (Brief recess.)

9 MR. GREENE: Back on the record.

10 Q. Now, Mr. Farny, I want to direct your attention
11 again back to Exhibit number ten, which is the Suppressive
12 Person Declare for Gerry Armstrong. In 1982 you were
13 posted within CSC, Church of Scientology of California?

14 A. That's correct.

15 Q. In 1982 CSC sued Gerald Armstrong, right?

16 A. Yes.

17 Q. And you were aware in 1982, were you not, that
18 Gerald Armstrong had been declared a suppressive person?

19 A. Yes, I was.

20 Q. Exhibit number ten purports to be a Suppressive
21 Person Declare with reference to Gerry Armstrong, right?

22 A. This is what it purports to be, but I can't
23 authenticate it because I can't remember what is said at
24 the time.

25 Q. Reviewing Exhibit ten is there anything about it

1 which would lead you to conclude that document is not
2 genuine?

3 A. It's words on a piece of paper. I have some
4 knowledge that I don't presently have. I wouldn't be able
5 to tell one way or the other.

6 Q. You are well familiar with Gerald Armstrong's
7 matters regarding Scientology, are you not?

8 MS. BARTILSON: Objection, vague and ambiguous
9 to the extent that it seeks knowledge that Mr. Farny may
10 have gained as a legal employee of the Church dealing with
11 attorneys. May also call for attorney-client privilege.

12 THE WITNESS: It's broad.

13 MS. BARTILSON: It's a little bit broad.

14 MR. BENZ: I'll overrule the objection and you
15 might rephrase it. The term well-acquainted might be a
16 little ambiguous. Acquainted would certainly be a proper
17 question.

18 THE WITNESS: "Matters" is a little broad
19 without some sort of definition.

20 MR. GREENE: Q. Starting with your employment
21 in the legal department of CSC, you actively followed the
22 events regarding the Armstrong litigation, didn't you?

23 A. Sure, that's a fair statement.

24 MR. WALTON: I'm sorry, Mr. Farny, I can't hear
25 you.

1 Suppressive Group List, would you review that, please?

2 A. I obviously have not read every word. The
3 attachment is in very small writing in multiple columns
4 for several pages, but I glanced over it.

5 Q. Have you seen this document before?

6 A. I believe so.

7 Q. This document appears to you to be accurate,
8 doesn't it?

9 A. Accurate compared to what? It appears to be
10 what it says, but I don't know on this list attached
11 whether -- I have to compare it to the one in the files to
12 be totally accurate.

13 Q. Directing your attention to page number four
14 where there's a section that says "declared suppressive
15 persons"?

16 A. Declared suppressive persons, yes.

17 Q. See where Gerry Armstrong is listed there in the
18 second column?

19 A. Yes.

20 Q. To the best of your knowledge, Gerald Armstrong
21 in 1992 was considered to be a suppressive person by
22 Scientology; isn't that right?

23 A. Again, the imprecise use of Scientology.

24 Q. Gerald Armstrong was considered by the
25 Scientology religion to be a suppressive person, wasn't

1 he?

2 A. I don't want to play word games. That's what
3 his status is to this day with regard to the Scientology
4 religion.

5 Q. That's right, and his status as an SP has been
6 ever since 1982; isn't that right?

7 A. That seems right, yeah.

8 Q. How often are suppressive persons and
9 suppressive group lists published?

10 A. I'm not certain. Periodically, and no, I don't
11 know if one was published since 1992.

12 Q. Now directing your attention to Exhibit number
13 12 --

14 MS. BARTILSON: Can I get a copy?

15 THE WITNESS: I flipped through it.

16 MR. GREENE: Q. Directing your attention to the
17 top of the first page, the actual HCO PL indicates that it
18 was revised on January 8, 1991?

19 A. That's what it says.

20 Q. To your knowledge that's when the green volumes
21 were revised, right or not?

22 A. I'm not certain exactly when in '91 they were
23 revised.

24 Q. Now directing your attention to the bottom of
25 the page where it says, "A suppressive person or a group

1 is one that actively seeks to suppress or damage
2 Scientology or a Scientologist by suppressive acts," do
3 you see that?

4 A. Yes.

5 Q. Is that definition of a suppressive person that
6 which you currently hold?

7 A. Yes.

8 Q. That definition of a suppressive person or group
9 has not changed over the time that you have been involved
10 in Scientology in general, has it?

11 A. It's essentially the same concept, yes.

12 Q. Now directing your attention to the next item
13 where it says in capital letter "Suppressive Acts are acts
14 calculated to impede or destroy Scientology or a
15 Scientologist and which are listed at length in this
16 policy letter," that definition of suppressive acts is
17 that which you currently hold, isn't it?

18 A. Yes.

19 Q. That definition has also essentially remained
20 the same throughout your affiliation with Scientology;
21 isn't that right?

22 A. Yes.

23 Q. Now turning the page and under the section
24 entitled Suppressive Acts, again it says, quote,
25 "Suppressive acts are defined as actions or omissions

1 of, I would say no because several of your questions have
2 elicited in hearsay statements from me and those certainly
3 would be suppressive acts. But testifying in a manner
4 falsely and with the intention of destroying Scientology
5 would, yes, be a suppressive act.

6 Q. Let me just direct your attention specifically
7 to the item that's right underneath falsifying records.

8 A. Right. I got you what you are saying.

9 Q. Now with respect to that which says "Testifying
10 or giving data against Scientology falsely or in
11 generalities or without personal knowledge of the matters
12 to which one testifies," that constitutes a suppressive
13 act, doesn't it?

14 A. If the testimony fits within the more embrative
15 definition of being an act undertaken knowingly to
16 suppress, impede or destroy Scientology as it says at the
17 beginning of this list, yes, it would be.

18 Q. Now going down the column to where it says
19 "Issuing alter-ised Scientology technical data or
20 information or instructional or admin procedures calling
21 it Scientology or calling it something else to confuse or
22 deceive people as to the true source, beliefs and
23 practices of Scientology," with respect to that that
24 constitutes a suppressive act, does it not?

25 A. Certainly, again within the overall embrative

1 standing with Scientology organizations," that's a
2 suppressive act, right?

3 A. Yes.

4 Q. Then the one following that where it says,
5 "Public statements against Scientology or Scientologists
6 but not to Committees of Evidence duly convened," that
7 type of conduct, too, is considered to be suppressive
8 activity to Scientology, right?

9 A. Would depend on the severity of the statements,
10 but, yes, it is on the list; it would be considered
11 suppressive.

12 Q. These items we're talking about here, these all
13 are a matter of ecclesiastical concern to Scientology,
14 right?

15 A. Yes.

16 Q. So all these matters that we've been talking
17 about here under the category of Suppressive Acts really
18 fall within the exclusive domain of the ecclesiastical
19 concern of Scientology, right?

20 A. Some of them also overlap into the State because
21 you have your garden variety felonies are also on the
22 list, but the ones that don't, the ones that specifically
23 pertain to ecclesiastical offenses are the exclusive
24 purview of the ecclesiastical authority to adjudicate
25 this.

1 CERTIFICATE OF DEPOSITION OFFICER

2
3 I, PENNY L. GILMORE, duly authorized to
4 administer oaths pursuant to Section 8211 of the
5 California Code of Civil Procedure, do hereby certify
6 that LYNN ROBERT FARNY, the witness in the foregoing
7 deposition, was by me duly sworn to testify the truth, the
8 whole truth and nothing but the truth in the
9 within-entitled cause; that said deposition was taken at
10 the time and place herein stated, that the testimony of
11 said witness was reported by me, a Certified Shorthand
12 Reporter and a disinterested person, and was thereafter
13 transcribed into computer-assisted transcription under my
14 direction.

15 I futher certify that I am not of counsel or
16 attorney for either or any of the parties in the foregoing
17 depositeon and caption named, nor in any way interested in
18 the outcome of the cause named in said caption.

19 IN WITNESS WHEREOF, I have hereunto set my hand
20 this 7th day of August 1994.

21
22 DEPOSITION OFFICER, CSR NO. 4724

23 I hereby certify this copy is a
24 true and exact copy of the
25 Original.

Penny L. Gilmore
DEPOSITION OFFICER, CSR NO. 4724

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---oOo---

COPY

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL
WALTON; THE GERALD ARMSTRONG
CORPORATION, a California for
profit corporation; DOES 1
through 100, inclusive,

Defendants.

AND RELATED CROSS-ACTION.

NO. 157-680

DEPOSITION OF:

LYNN R. FARNY

Tuesday, July 26, 1994

VOLUME III

Reported by:
SUSAN M. LYON
CSR NO. 5829

PENNY L. GILMORE & ASSOCIATES
DEPOSITION REPORTERS
P.O. BOX 862
ROSS, CALIFORNIA 94957
(415) 457-7899

1 A. Same building.

2 Q. And where is that building?

3 A. Corner of Hollywood Boulevard in Los Angeles.

4 Q. And what's the address?

5 A. 6331 Hollywood Boulevard.

6 Q. I want to direct your attention now to Exhibit 15,
7 which is a two-page document entitled Executive Directive,
8 dated 20 September, 1984.

9 Now, at this point you were working, in 1984, you
10 were working in the legal division of CSI, weren't you?

11 A. That's right.

12 Q. And do you recognize this document, Exhibit 15?

13 A. Yes.

14 Q. Okay.

15 MR. BOWLES: Do you have a copy of that, Mr.
16 Greene?

17 MR. GREENE: I don't. I apologize.

18 Actually, I do. I've got a --

19 MR. BOWLES: Thanks.

20 MR. GREENE: -- shrunken copy.

21 Q. Would you tell me what Exhibit 15 is, please.

22 A. It's an executive directive of Office of Special
23 Affairs International purporting to be issued on or about
24 20 September, 1984.

25 Q. Now, have you seen this document or a copy thereof

1 before?

2 A. I've seen a copy of the Office of Special Affairs
3 International executive directive 19 before, yes.

4 Q. And what is OSA Int executive directive 19?

5 MR. BOWLES: You want him to describe the document
6 or --

7 MR. GREENE: No, just what his --

8 Q. You say you've seen it before and you're familiar
9 with it. So if you would tell me what the meaning of the
10 document is.

11 A. It was a document that was issued in the fall, late
12 summer or early fall of 1984 to provide information for
13 Scientologists concerning the ecclesiastical status of
14 certain individuals discussed therein.

15 Q. And the ecclesiastical status with respect to the
16 individuals set forth in Exhibit 15 is that their actions
17 were destructive and aimed at the enslavement rather than
18 the freedom of man; right?

19 MR. BOWLES: Are you just reading from the
20 document, Mr. Greene or --

21 THE WITNESS: He is.

22 MR. BOWLES: That speaks for itself.

23 THE WITNESS: That's line two through four, three
24 and four.

25 MR. GREENE: Q. You can answer the question.

1 A. It would appear so. That's what the document says.

2 Q. All right. Now, based on your knowledge of matters
3 which transpired in the fall of 1984 within CSI, it's
4 true, is it not, that it was generally known that Gerald
5 Armstrong had been designated as a squirrel; right?

6 MR. BOWLES: Objection, vague. Generally known
7 where?

8 MR. GREENE: Within CSI.

9 THE WITNESS: I don't know how generally known it
10 was within CSI.

11 MR. GREENE: Q. It was known to you, wasn't it?

12 A. I'm not certain that Gerry did much active
13 squirreling. He was obviously included in this issue
14 because of his involvement with Lipkin and Ristuccia in
15 the plot that was revealed in Griffith Park.

16 Q. Okay.

17 A. It was -- actually around September was in the
18 process of being revealed, if I remember right. But it
19 was around that time period that that went down as well.

20 So I'm not certain how much active squirreling he
21 did, but he certainly earned inclusion in this with the
22 rest of these individuals through that activity.

23 Q. All right. And there's nothing, to your knowledge,
24 that's set forth in Exhibit 15 that's false, is there?

25 A. I'd have to read the whole thing.

1 the legal process. That's garbage and you know it.

2 This paid, hired gun people who would come in and
3 say bad things just because they were being paid to do so
4 were removed from the marketplace forcing you guys to deal
5 with facts, and that appears to be something you can't
6 tolerate, and that's why you got a problem with it, just
7 so we're clear.

8 Q. I really appreciate your expounding, Mr. Farny.

9 A. Hey, no problem.

10 Q. Also, Howard Schomer, Homer Schomer was a witness
11 in Wollersheim, wasn't he?

12 A. No, he was not allowed to testify. The court ruled
13 he had nothing relevant to say to any issue and forbade
14 him from opening his mouth in front of the jury.

15 Q. You testified in Wollersheim; right?

16 A. Yes.

17 Q. And Edward Walters testified in Wollersheim as
18 well?

19 A. Same category as Sullivan, yes.

20 Q. And, in fact, he and Sullivan testified not on any
21 mistreatment of Wollersheim but on the manner in which
22 Scientology operated; right?

23 A. No. They made up their schtick and just, you know,
24 flapped their gums just like they were being paid to do.

25 Q. Okay. And then you include, with respect to the

1 characterization of them making up their schtick and
2 flapping their gums, you would apply the same type of
3 characterization to Gerald Armstrong, wouldn't you?

4 A. In what context?

5 Q. In the context of his participation in litigation
6 and his phony declarations?

7 A. Well, I'll stipulate that the declarations are
8 phony and that they contain lies.

9 Q. That's your view of them; right?

10 A. Certainly.

11 Q. And that Armstrong's -- he was lying about
12 Scientology and its founder, as was Sullivan and Walters;
13 right?

14 A. All three told things that were not true, that were
15 lies, yes.

16 Q. And so did Schomer, didn't he?

17 A. He even admitted to having lied.

18 Q. Now, the stipulation whereby if Breckenridge's
19 decision was reversed by Scientology's unopposed appeal
20 thereof --

21 A. Time out, I can't adopt your characterization of it
22 because the appeal at that stage had already been fully
23 briefed, there was no further need for an appeal brief --
24 now just let me finish.

25 Q. Go ahead.

1 protect their overts against mankind and their only way
2 out of this universe."

3 Q. That's correct. So let me ask you some questions
4 about that paragraph, if I may, as it relates to Gerald
5 Armstrong. Is that all right?

6 A. Except that I'm not sure as of September 1984
7 whether he had given such testimony. It does say some of
8 them. If he had, fine. I'm pretty sure he had, so we can
9 proceed and I'll do the best I can.

10 Q. All right. Hal Lipkin of the IRS; right?

11 A. That wouldn't be testimony. It would be
12 information.

13 Q. Information?

14 A. Right.

15 Q. False testimony here is testimony, to your
16 knowledge, used in the legal sense or in a more generic
17 sense?

18 A. You got me.

19 Q. Based on --

20 A. My guess would be legal, because false testimony
21 implies perjurious conduct rather than merely lies. And I
22 think if it was merely lies, we would have said lies or
23 false statements.

24 Q. Well, it's your view, is it not, that Armstrong
25 testified falsely in the course of Armstrong One, isn't

1 it?

2 A. Yes.

3 Q. And his declarations contained perjurious lies?

4 A. Yes. And I'm aware of those going to the IRS, so
5 yes, this paragraph would apply to him.

6 Q. Now, would you explain to me what your
7 understanding is of the meaning of the phrase "in order to
8 protect their overts against mankind"?

9 A. Each of these individuals had been in a position of
10 trust with regard to the religion of Scientology.

11 Gerry had been in a position of trust with regards
12 to the personal archives of the founder of the religion.

13 Kima, Dee Dee, John Nelson, Laurel Sullivan and
14 David Mayo all had positions of trust, some quite senior
15 to the position Armstrong had.

16 What this phrase means is that each of these
17 individuals committed harmful acts, an overt is a harmful
18 act, against Scientology in violation of that trust,
19 rather serious harmful acts to wind them up in the
20 position that they were in as of the 20th of September,
21 1984.

22 Well, it makes those destructive acts a lot more
23 palatable if one can get the IRS to come down on the
24 church, and that's what's meant by that.

25 These people were providing false information to

1 A. No. What I said is sometimes the issues, executive
2 directives specifically, would have annotated packages
3 that go with them, with the documentary support.

4 Q. I see.

5 A. And sometimes they would not.

6 Q. All right.

7 A. I just don't know with respect to this one.

8 MR. GREENE: I'd like to mark this as Exhibit 19.

9 (Defendant's Exhibit No. 19 marked.)

10 MR. GREENE: Q. I'm showing you Exhibit 19, which
11 is an eight-page document, which is entitled HCO policy
12 letter of 21 November, 1972.

13 You can take a look at that, please.

14 A. Do you want me to read the entire thing or focus on
15 something in particular?

16 Q. Initially, peruse it.

17 A. I've perused it.

18 Q. You're familiar with the term black propaganda, are
19 you not?

20 A. Yes.

21 Q. And looking at the first paragraph of Exhibit 19,
22 does that appear, to your knowledge, to be an accurate
23 definition of black propaganda?

24 A. Yes.

25 Q. Now, in your view, was Gerald Armstrong engaged in

1 a campaign of black propaganda against Scientology?

2 A. Any parameters as to time?

3 Q. Ever since December 1981.

4 A. Not the entire time period, but certainly large
5 portions of that, yes.

6 Q. What portions of that time period do you exclude?

7 A. The time between when he walked out the door in
8 December '81 and his first act and the time after December
9 '86 up until his first act after that.

10 Q. And when was his first act after December 1986?

11 A. To the best of my knowledge, it was in '89
12 sometime, late '89.

13 Q. And what specifically was the act to which you were
14 making reference?

15 A. Those we've discussed at length over the past three
16 days.

17 Q. Which one?

18 A. The first, the first one in sequence.

19 Q. Which was the first in sequence, to your knowledge?

20 A. The Corydon one, I believe, was the first in
21 sequence.

22 Q. And with respect to Corydon, what was it that
23 Armstrong, what did he do?

24 A. What did he do?

25 Q. Did he testify? What did he do?

1 A. Once he got into deposition in the spring, I
2 believe, he was spreading black propaganda, spreading
3 lies.

4 Q. So the black propaganda that he gave and the lies
5 that he spread were given under penalty of perjury in the
6 course of the legal proceeding?

7 A. By no means all of them. He's done a lot of media
8 in this country and abroad.

9 Q. And are you familiar with Exhibit 19?

10 A. I am familiar with the policy letter entitled "How
11 to Handle Black Propaganda. I haven't read this one word
12 for word to make a comparison.

13 Q. Would you take a look at it to whatever extent you
14 need to tell me, at least generally, it comports with the
15 policy letter with which you are familiar?

16 A. I'd say generally it does, but that's not an
17 authentication.

18 Q. Okay.

19 A. Those are easier done in written discovery when
20 you've got time to do just the word by word comparison.

21 Anyway, generally it does appear to be that policy
22 letter, yes.

23 MR. GREENE: I want to mark another exhibit as 20.

24 (Defendant's Exhibit No. 20 marked.)

25 MR. GREENE: Q. Exhibit 20 is a four-page document

1
2 I, SUSAN M. LYON, a Certified Shorthand Reporter in
3 and for the State of California, do hereby certify:

4 That the witness named in the foregoing deposition
5 was present and duly sworn to testify the truth in the
6 within-entitled action on the day and date and at the time
7 and place therein specified;

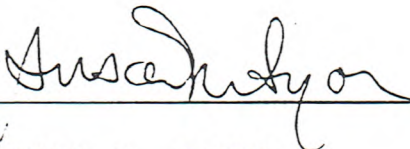
8 That the testimony of said witness was reported by
9 me in shorthand and was thereafter transcribed under my
10 direction into typewriting;

11 That the foregoing constitutes a full, true and
12 correct transcript of said deposition and of the
13 proceedings which took place;

14 That the witness was given an opportunity to read
15 and, if necessary, correct said deposition and to
16 subscribe the same;

17 That I am a disinterested person to the said
18 action;

19 IN WITNESS WHEREOF, I have hereunto subscribed my
20 hand this 8th day of August 1994.

21
22 
23 SUSAN M. LYON

24 CSR #5829
25

HCO POLICY LETTER OF 1 FEBRUARY 1979

REISSUED 12 APRIL 1983

Remimeo
Tech/Qual
HCO

(Reissued as part of the
Keeping Scientology Working Series)

(Also issued as HCOB 15 Feb. 1979, same title)

Keeping Scientology Working Series 24

PPK/DEPT EXHIBIT

PENNY L. GILMORE, Reporter

VERBAL TECH: PENALTIES

(Ref: HCOB/HCO PL 9 Feb. 79, HOW TO DEFEAT VERBAL TECH)

ANY PERSON FOUND TO BE USING VERBAL TECH SHALL BE SUBJECT TO A COURT OF ETHICS.

THE CHARGES ARE GIVING OUT DATA WHICH IS CONTRARY TO HCO BULLETINS OR POLICY LETTERS, OR OBSTRUCTING THEIR USE OR APPLICATION, CORRUPTING THEIR INTENT, ALTERING THEIR CONTENT IN ANY WAY, INTERPRETING THEM VERBALLY OR OTHERWISE FOR ANOTHER, OR PRETENDING TO QUOTE THEM WITHOUT SHOWING THE ACTUAL ISSUE.

ANY ONE OF THESE CATEGORIES CONSTITUTES VERBAL TECH AND IS ACTIONABLE PER THE ABOVE.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Head, Sussex

HCO POLICY LETTER OF 5 MARCH 1965

Remimeo

Issue II

POLICY: SOURCE OF

ARMSTRONG
PFL/DEF/EXHIBIT

WIT: [Signature]
PEGGY L. GILMORE, Reporter

7.12.94

According to *Webster's New World Dictionary*:

POLICY: Political wisdom or cunning; diplomacy; prudence; artfulness. Wise, expedient or crafty conduct or management. *Any governing principle, plan or course of action.*

The last definition is the one we use.

According to the *World Book Encyclopedia Dictionary*, the one we most use (published by Field Enterprises Educational Corporation, Merchandise Mart Plaza, Chicago 54, Illinois, USA)

POLICY: A plan of action; way of management. Practical wisdom; prudence. Political skill or shrewdness. *Obsolete*—the conduct of public affairs; government.

~~The sense in which we use policy is the rules and administrative formulas by which we agree on action and conduct our affairs.~~

A "policy letter" is one which contains one or more policies and their explanation and application.

It is issued by the Hubbard Communications Office, is written by L. Ron Hubbard or written (more rarely) for him, has the agreement of the International Board and is basic organizational law in organizations.

A "policy letter" is not Scientology org policy unless written or authorized by L. Ron Hubbard and passed as a resolution or covered by blanket resolution of the International Board and issued or published by an HCO. It is not policy if any of those steps are missing.

The International Board is composed of three board members: L. Ron Hubbard, Chairman; Mary Sue Hubbard, Secretary; and Marilyn Routson, Treasurer. It is the controlling board of Scientology.

The Chairman, Hubbard Communications Office and HCO Secretaries and staffs compose Division 1 of the International Board and all orgs.

The Secretary and all Organization Secretaries (US and Saint Hill) or Association Secretaries (Commonwealth and South Africa) and their staffs compose Division 2 of the International Board and all orgs.

The Treasurer, Assistant Treasurers, all accounting executives, and assistants for Materiel and their staffs compose Division 3 of the International Board and all orgs.

Policy for all divisions and orgs is made as above.

There are no other boards or board members, individual board members, officers or secretaries with the power of issuing policy. Boards issue resolutions. Individual board members or officers can issue directives, general orders, and orders. These expire if not reissued as policy.

Other officers issue administrative directives in place of policy letters but these may only forward policy.

Secretarial Executive Director orders apply mainly to personnel or local conditions, expire in one year if not stated to expire earlier, may only last one year in any event.

Policy letters apply broadly to all orgs and Scientologists without exception.

Almost all policy has been developed by actual experience.

The only way policy can be changed is by writing up a policy letter in full and sending it to L. Ron Hubbard for approval or disapproval.

Policies cover hats, duties, lines, procedures, rules, laws and all other aspects of Scientology activity except technology.

Technology is covered in HCO Bulletins

HCO Bulletins are written by or (more rarely) for L. Ron Hubbard and are issued by HCO and HCO Secretaries. They do not require sanction by the International Board.

No one else may issue or authorize an HCO Bulletin.

HCO Bulletins are recommended technical data. Certificates are awarded on the data contained in them and violation of it can therefore cause a suspension of the certificate. This is the main power of the HCO Bulletin.

An HCO Bulletin becomes policy only if mentioned in a policy letter.

A book may become policy if made so by a policy letter.

HCO Policy Letters are printed or (more commonly) mimeographed in green ink on white paper. This color combination may not be used for any other releases in Scientology. Reprinted policy letters sometimes appear in magazines in black ink on white paper but they are not the original.

HCO Bulletins are printed or mimeographed in red ink on white paper. This color combination may not be used for any other purpose in Scientology. Reprinted HCO Bulletins sometimes appear in magazines in black ink on white paper but they are not the original.

Committees of Evidence are called for in any violation of the publishing or counterfeiting of an HCO Policy Letter or an HCO Bulletin or their color combinations or signatures.

The only other official paper from L. Ron Hubbard and HCO is the HCO Executive Letter, usually a direct executive order or a request for a report or data or news or merely information. It is not policy but should be answered if an answer is requested. It is blue ink on green paper.

Using the color combination for any other purpose or counterfeiting one calls for a Committee of Evidence.

Sec EDs and HCO Executive Letters are basically LRH comm lines but are used by International Board Officers also if authorized.

The other divisions (2 and 3) have other means of comm, with other color flashes.

If it is not in an HCO Policy Letter it is not policy.

HCO Policy Letters do not expire until canceled or changed by later HCO Policy Letters.

No officer or Scientology personnel may set aside policy even when requesting revision.

L. RON HUBBARD
Founder

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Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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HCO POLICY LETTER OF 9 AUGUST 1972

Remmeo
All Executive
Hats
All Bureau
Hats

SENIORITY OF ORDERS

Carver
PFL/DEPT EXHIBIT
WIT: *Farley*
PENNY L. GILMORE, Reporter

7.12.94

No Aides Order or Flag Bureau Data Letter or Executive Directive, Directive or Base Order of any type or kind, written or verbal, may alter or cancel any Policy Letter or HCOB. These remain senior.

HCO Policy Letters are senior in admin. HCO Bulletins are senior to all other orders in tech.

Only Policy Letters may revise or cancel Policy Letters. Only HCOBs may revise or cancel HCOBs.

No Aides Order or other directive or order may abolish a network or org or change the form of an org.

HCO PLs and HCOBs require passing by LRH or the full authority of International Board Members as well as the Authority and Verification Unit.

Telexes which inform orgs or executives of modifications or cancellations of HCO PLs or HCOBs must quote the revision HCO PL or HCOB, and the revision must in fact exist and itself be issued and follow.

Any practice by which junior issues such as Directives abolish networks or make off-policy changes can only result in the destruction of networks, orgs and tech.

This is therefore a HIGH CRIME Policy Letter and it is an offense both to follow or obey or issue any verbal or written order or directive which is contrary to or changes or "abolishes" anything set up in HCO Policy Letters or HCOBs, including the downgrade of "that's out-of-date" or "that's been canceled" without showing the HCO PL or HCOB which revises or cancels.

HCO PLs and HCOBs are proven by time and are the senior data on which we operate.

L. RON HUBBARD
Founder

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HCO POLICY LETTER OF 25 NOVEMBER 1970
(CORRECTED AND REISSUED 27 NOV. 1970)

Remimeo

Org Series 16

POLICY AND ORDERS

Armstrong
PFL/REF/EXHIBIT
WIT: *Tanny*
PENNY L. GILMORE, Reporter
7-12-94

Probably the greatest single confusion that can exist in the subject of organizing is the reversal of "policy" and "orders."

When definitions of these two things are not clearly understood, they can be identified as the same thing or even reversed.

When they are not understood plainly then staff members set their own policy and demand orders from top management, totally reversing the roles.

Confusion thus generated can be so great as to make an organization unmanageable. It becomes impossible for staff to do its job and management cannot wear its hat.

People in an organization obsessively demand orders from policy source and then act on their own policy. This exactly reverses matters and can be a continual cause of disorganization.

As policy is the basis of group agreement, unknown policy or policy set by the wrong source leads to disagreement and discord.

Demanding or looking for orders from policy source and accepting policy from unauthorized sources of course turns the whole organization upside down. The bottom of the org board becomes the top of the org bd. And the top is forced to act at lower levels (order issue) which pulls it down the org bd.

But this is not strange as we are dealing here with principles rather new in the field of organization, principles which have not been crisply stated. THERE IS NO EXACT ENGLISH WORD for either of these two functions.

POLICY as a word has many definitions in current dictionaries amongst which only one is partially correct: "A definite course or method of action to guide and determine future decisions." It is also "prudence or wisdom," "a course of action" and a lot of other things according to the dictionary. It even is said to be laid down at the top.

Therefore the word has so many other meanings that the language itself has become confused.

Yet, regardless of dictionary fog, the word means an exact thing in the specialized field of management and organization.

POLICY MEANS THE PRINCIPLE EVOLVED AND ISSUED BY TOP MANAGEMENT FOR A SPECIFIC ACTIVITY TO GUIDE PLANNING AND PROGRAMING AND AUTHORIZE THE ISSUANCE OF PROJECTS BY EXECUTIVES WHICH IN TURN PERMIT THE ISSUANCE AND ENFORCEMENT OF ORDERS THAT DIRECT THE ACTIVITY OF PERSONNEL IN ACHIEVING PRODUCTION AND VIABILITY.

POLICY is therefore a principle by which the conduct of affairs can be guided.

A policy exists, or should exist, for each broad field or activity in which an organization is involved.

Example: The company has a lunchroom for its employee. Top policy concerning it might be "To provide the employees cheaply with good food and clean fast service." From this the lunchroom manager could plan up and program how he was going to do this. With these approved they form the basis of the orders he issues.

Now let us say the manager of the lunchroom did not know organization and that he did not try to get a policy set or find if there was one and made up his own policy and planned and programmed and issued his orders on that. Only the policy *he* makes up is "To make dough for the company."

Now the wild melee begins.

Top management (the lunchroom manager's highest boss) sees stenos eating cold lunches brought from home at their desks. And begins to investigate. How come? Stenos then say, "We find it cheaper to eat our own lunches." Top management finds coffee in the lunchroom is terrible and costs several shillings. Dried out sandwiches cost a fortune. There is no place to sit . . . etc. So top management issues *orders* (not policy). "Feed that staff!" But nothing happens because the lunchroom manager can't and still "make dough for the company." Top management issues more *orders*. The lunchroom manager thinks they must be crazy at board level. How can you make dough and still feed the whole staff? And top management thinks the lunchroom manager is crazy or a crook.

Now you multiply this several times over in an organization and you get bad feeling, tension and chaos.

Let us say top management had issued policy: "Establish and run a lunchroom to provide the employees cheaply with good food and clean fast service." But the lunchroom manager hired knew nothing of organization, heard it, didn't realize what policy was and classified it as a "good idea." Idealistic, probably issued for PR with employees. "But as an experienced lunchroom man I know what they really want. So we'll make a lot of dough for the company!"

He thereafter bases *all* his orders on this principle. He buys lousy food cheap, reduces quality, increases prices, cuts down cost by no hiring and does make money. But the company gets its income from happy customers who are handled by happy staff members. So the lunchroom manager effectively reduces the real company income by failing to cater to staff morale as was intended.

UNPREDICTABLE

It is a complete fact that no top management can predict WHAT policy will be set by its juniors.

The curse of this is that top management depends on "common sense" and grants greater knowledge of affairs to others at times than is justified. "Of course anybody would know that the paper knives we make are supposed to cut paper." But the plant manager operates on the policy that the plant is supposed to provide employment for the village. You can imagine the squabble when the paper knives which do NOT cut paper fail to sell and a threatened layoff occurs.

Nearly all labor-management hurricanes blow up over this fact of ignorance of policy. It is not actually a knowing conflict over different policies. It's a conflict occurring on the unknown basis of unknown or unset policy of top management and the setting of policy at an unauthorized level.

ORDERS

"Order" takes up two small print columns of the two-ton dictionaries.

The simple definition is

AN ORDER IS THE DIRECTION OR COMMAND ISSUED BY AN AUTHORIZED PERSON TO A PERSON OR GROUP WITHIN THE SPHERE OF THE AUTHORIZED PERSON'S AUTHORITY.

By implication an ORDER goes from a senior to juniors.

Those persons who do not conceive of an organization larger than a few people tend to lump all seniors into order-issuers, tend to lump anything such a senior says into the category of order and tend to lump all juniors into order-receivers.

This is a simple way of life, one must say.

Actually it makes all seniors bosses or sergeants and all juniors into workers or privates. It is a very simple arrangement. It does not in any way stretch the imagination or sprain any mental muscles.

Unfortunately such an organized arrangement holds good for the metal section of the shop or a platoon or squad. It fails to take into account more sophisticated or more complex organizations. And it unfortunately requires a more complex organization to get anything done.

Where one has squad mentality in a plant or firm, one easily gets all manner of conflict.

Few shop foremen or sergeants or chief clerks ever waste any time in trying to tell the "rank and file" what the policy is. "Ours was not to reason why" was the death song of the Light Brigade. And also the open door to communism.

Communism is unlikely to produce a good society because it is based on squad mentality. Capitalism has declined not because it was fought but because it could not cope with squad mentality. The policies of both are insufficiently embrative of the needs of the planet to achieve total acceptability.

An order can be issued solely and only because its issuer has in some fashion attained the right to issue the instruction and to expect compliance.

The officer, the chief clerk, the shop steward, the sergeant, each one has a license, a warrant, a "fiat" from a higher authority which entitles him to issue an *order* to those who are answerable to him.

So where does this authority to issue orders come from?

The head of state, the government, the board of directors, the town council, such bodies as one could consider top management in a state or firm, issues the authority to issue orders.

Yet such top persons usually do not issue authority to issue orders without designating what the sphere of orders will be and what they will be about.

This is the policy-making, appointment-making level at work.

All this is so poorly and grossly defined in the language itself that very odd meanings are conceived of "policy" and "orders."

Unless precise meanings are given, then organization becomes a very confused activity.

Understood in this way, the following sentence becomes very silly: "The board of directors issued orders to load the van and the driver was glad to see his policy of interstate commerce followed."

Yet a group will do this to its board of directors constantly. "You did not issue

orders. . . . "We were waiting for orders. . . ." "I know we should have opened the doors but we had no order . . . n the council. . . ."

The same group members, waiting for orders to sit or stand by special board resolution, will yet set policy continually. "We are trying to let others do their jobs without interference." "I am now operating to make each member of my department happy." "I am running this division to prevent quarrels."

Remi

Ask officers, secretaries, in-charges, "What policy are you operating on?" and you will get a quick answer that usually is in total conflict or divergence from any board policy. And you will get a complaint often that nobody issues their division orders so they don't know what to do!

The fact is that POLICY gives the right to issue orders upon it to get it in, followed and the job done.

A group of officers each one issuing policy madly while waiting for the head of the firm to give them orders is a scene of mix-up and catastrophe in the making.

Policy is a long, long-range guiding principle.

An order is a short-term direction given to implement a policy or the plans or programs which develop from policy.

"People should be seated in comfortable chairs in the waiting room" is a policy.

"Sit down" is an order.

If policy is understood to authorize people to issue orders, the picture becomes much clearer.

"Clearing post purpose" is another way of saying "Get the policy that establishes this post and its duties known and understood."

LF
C
by
A

Unless an organization gets this quite straight, it will work in tension and in internal conflict.

When an organization gets these two things completely clear, it will be a pleasant and effective group.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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The Organization Executive Course

Amstrong
12
PFL/DEPT EXHIBIT
WIT: *Fanny*
PENNY L. GILMORE, Reporter
7-12-94

by
L. Ron Hubbard

HCO
DIVISION
VOLUME
1

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HCO POLICY LETTER OF 23 DECEMBER 1965RB

REVISED 8 JANUARY 1991

Gen. Non-Reminisc
Post Public
Bulletin Board
All Orgs
All Missions
Int'l Justice Chief
Snr HCO Network
All HCOs
MAAs
Ethics Officers

(HCO Division 1)

Ethics

SUPPRESSIVE ACTS

SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS

Refs:

HCOB	10 Sept. 83	PTSness AND DISCONNECTION
Tape:	6505C18	"Organization and Ethics"
Tape:	6506C08	"Handling the PTS"
Tape:	6608C02	"Suppressives and GAEs"
Tape:	6608C25	"The Antisocial Personality"
HCOB	27 Sept. 66	THE ANTISOCIAL PERSONALITY THE ANTI-SCIENTOLOGIST
HCOB	24 Apr. 72 I	C/S Series 79 ExDn Series 5 PTS INTERVIEWS
HCOB	10 Aug. 73	PTS HANDLING
HCOB	31 Dec. 78RA II Rev. 26.7.86	OUTLINE OF PTS HANDLING
HCOB	31 Dec. 78RA III Rev. 21.3.89	EDUCATING THE POTENTIAL TROUBLE SOURCE. THE FIRST STEP TOWARD HANDLING. PTS C/S-I
HCO PI.	20 Oct. 81R Rev. 10.9.83	PTS TYPE A HANDLING
HCOB	8 Mar. 83	HANDLING PTS SITUATIONS
HCOB	17 Apr. 72R Rev. 20.12.83	C/S Series 76R C/Sing A PTS RUNDOWN

Due to the extreme urgency of our mission, I have worked to remove some of the fundamental barriers from our progress.

The chief stumbling block, huge above all others, is the upset we have with POTENTIAL TROUBLE SOURCES and their relationship to suppressive persons or groups.

A POTENTIAL TROUBLE SOURCE is defined as a person who while active in Scientology or a pc yet remains connected to a person or group that is a suppressive person or group.

A SUPPRESSIVE PERSON or GROUP is one that actively seeks to suppress or damage Scientology or a Scientologist by suppressive acts.

SUPPRESSIVE ACTS are acts calculated to impede or destroy Scientology or a Scientologist and which are listed at length in this policy letter.

REF ID: A51745 F.E.
Scientologist caught in the situation of being connected with a suppressive person or group is given a present time problem of sufficient magnitude to prevent case gain, as only a PTP can halt progress of a case. Only ARC breaks worsen it. To the PTP is added ARC breaks with the suppressive person or group. The result is no-gain or deterioration of a case by reason of the suppressive connection in the environment. Any Scientologist, in his own experience, can probably recall some such cases and their subsequent upset.

Until the environment is handled, nothing beneficial can happen. Quite the contrary. In the most flagrant of such cases, the Scientologist's case worsened and the suppressive person or group sent endless distorted or false reports to press, police, authorities and the public in general.

Unless the potential trouble source, the preclear caught up in this, can be made to take action of an environmental nature to end the situation, one has a pc or Scientologist who may cave in or squirrel because of no case gain and also a hostile environment for Scientology.

This policy letter gives the means and provides the policy for getting the above situation handled.

A potential trouble source may receive no processing until the situation is handled.

Suppressive persons or groups relinquish their rights as Scientologists by their very actions and may not receive the benefits of the Codes of the Church.

The families and adherents of suppressive persons or groups may not receive processing. It does not matter whether they are or are not Scientologists. If the families or adherents of suppressive persons or groups are knowingly processed, any auditor doing so is guilty of a misdemeanor. (See HCO PL of 7 Mar. 65RA III, OFFENSES AND PENALTIES.)

A potential trouble source knowingly permitting himself or herself or the suppressive person to be processed without advising the auditor or Scientology authorities is guilty of a crime. (See HCO PL of 7 Mar. 65RA III, OFFENSES AND PENALTIES.)

SUPPRESSIVE ACTS

Suppressive acts are defined as actions or omissions undertaken to knowingly suppress, reduce or impede Scientology or Scientologists.

Such suppressive acts include:

Any felony (such as murder, arson, etc.) against person or property.

Sexual or sexually perverted conduct contrary to the well-being or good state of mind of a Scientologist in good standing or under the charge of Scientology, such as a student or a preclear.

Blackmail of Scientologists or Scientology organizations threatened or accomplished—in which case the crime being used for blackmail purposes becomes fully outside the reach of Ethics and is absolved by the fact of blackmail unless repeated.

Using the trademarks and service marks of Dianetics and Scientology without express permission or license from the owner of the marks or its authorized licensee.

Falsifying records.

Testifying or giving data against Scientology falsely or in generalities or without personal knowledge of the matters to which one testifies.

Organizing splinter groups to diverge from Scientology practices still calling it Scientology or calling it something else.

Organizing a splinter group to use Scientology data or any part of it to distract people from standard Scientology.

Using Scientology (or perverted and alter-ised tech and calling it Scientology) harmfully so as to bring about disrepute to an org, group or Scientology itself.

Issuing alter-ised Scientology technical data or information or instructional or admin procedures, calling it Scientology or calling it something else to confuse or deceive people as to the true source, beliefs and practices of Scientology.

Unauthorized use of the materials of Dianetics and Scientology.

Holding, using, copying, printing or publishing confidential materials of Dianetics and Scientology without express permission or license from the author of the materials or his authorized licensee.

Falsely attributing or falsely representing oneself or others as source of Scientology or Dianetics technology; or using any position gained with staff and/or public to falsely attribute nonsource material to source or to falsely represent nonsource material as authorized Scientology or Dianetics technology.

Acts calculated to misuse, invalidate or alter-is legally or in any other way the trademarks and service marks of Dianetics and Scientology.

Intentional and unauthorized alteration of LRH technology, policy, issues or checksheets.

Developing and/or using squirrel processes and checksheets.

Knowingly giving testimony which is false, a generality or not based on personal knowledge to imperil a Scientologist.

Public disavowal of Scientology or Scientologists in good standing with Scientology organizations.

Public statements against Scientology or Scientologists but not to Committees of Evidence duly convened.

Proposing, advising or voting for legislation or ordinances, rules or laws directed toward the suppression of Scientology.

Pronouncing Scientologists guilty of the practice of standard Scientology.

- Testifying hostile before state or public inquiries to Scientology to suppress it.
- Reporting or threatening to report Scientology or Scientologists to civil authorities in an effort to suppress Scientology or Scientologists from practicing or receiving standard Scientology.
- Bringing civil suit against any Scientology organization or Scientologist, including the nonpayment of bills or failure to refund, without first calling the matter to the attention of the International Justice Chief and receiving a reply.
- Demanding the return of any or all fees paid for standard training or processing actually received or received in part and still available but undelivered only because of departure of the person demanding (the fees must be refunded but this policy applies).
- Writing anti-Scientology letters to the press or giving anti-Scientology or anti-Scientologist data to the press.
- Continued membership in a divergent group.
- Continued adherence to a person or group pronounced a suppressive person or group by HCO.
- Failure to handle or disavow and disconnect from a person demonstrably guilty of suppressive acts.
- Being at the hire of anti-Scientology groups or persons.
- Calling meetings of staffs or field auditors or the public to deliver Scientology into the hands of unauthorized persons or persons who will suppress it or alter it or who have no reputation for following standard lines and procedures.
- Infiltrating a Scientology group or organization or staff to stir up discontent or protest at the instigation of hostile forces.
- Mutiny.
- Seeking to splinter off an area of Scientology and deny it properly constituted authority for personal profit, personal power or "to save the organization from the higher officers of Scientology."
- Engaging in malicious rumormongering to destroy the authority or reputes of higher officers or the leading names of Scientology or to "safeguard" a position.
- Delivering up the person of a Scientologist without justifiable defense or lawful protest to the demands of civil or criminal law.
- Receiving money, favors or encouragement to suppress Scientology or Scientologists.
- Using an org position or comm line to build up a private practice which reroutes org students, pcs and/or staff off org lines.
- Severe breach of ecclesiastical and/or fiduciary duty as an executive or corporate official of any Scientology or Dianetics organization which has resulted in severe harm, loss or disrepute for Scientology or the organization.

Using Scientology lines personal profit in such a way to cause disruption in the organization or to block the flow of public up the Bridge.

Using the mailing lists of Scientology or Dianetics organizations for personal profit or gain.

Employing org staff members to the detriment of the production or the establishment of the organization.

Providing an organization's preclear folders, ethics files, student files, accounts files, Central Files folders or Central Files lists or partial lists or Addresso lists or partial lists to any individual, group, organization, mission or other unit or agency for any reason or purpose, except those covered explicitly in existing Church policy; or to provide such files or lists to any individual, group, organization, mission or other unit or agency which is unauthorized by or in bad standing with the Mother Church.

Calculated efforts to disrupt Church services or the flow of public up the Bridge through the Churches.

Refusal to allow staff or public to progress up the Bridge or creating blocks on the Bridge preventing such progression.

Blatant and willful obstruction of Church operations or interference with Church contractual and other obligations to the detriment of Church expansion or activities.

Violation or neglect of any of the ten points of Keeping Scientology Working, as listed here:

One: Having the correct technology.

Two: Knowing the technology.

Three: Knowing it is correct.

Four: Teaching correctly the correct technology.

Five: Applying the technology.

Six: Seeing that the technology is correctly applied.

Seven: Hammering out of existence incorrect technology.

Eight: Knocking out incorrect applications.

Nine: Closing the door on any possibility of incorrect technology.

Ten: Closing the door on incorrect application.

Violations of any of the ten points listed below that are Technical Degrades:

1. Abbreviating an official course in Dianetics and Scientology so as to lose the full theory processes and effectiveness of the subjects.

2. Adding comments to checksheets or instructions labeling any material "background" or "not used now" or "old" or any similar action which

will result the student not knowing, using and applying the data in which he is being trained.

3. Employing after 1 Sept. 1970 any checksheet for any course not authorized by myself or the Authority, Verification and Correction Unit International (AVC Int).

(Hat checksheets may be authorized locally.)

4. Failing to strike from any checksheet remaining in use meanwhile any such comments as "historical," "background," "not used," "old," etc., or *verbally stating it to students*.
5. Permitting a pc to attest to more than one grade at a time on the pc's own determinism without hint or evaluation.
6. Running only one process for a lower grade between 0 to IV, where the grade end phenomena has not been attained.
7. Failing to use all processes for a level where the end phenomena has not been attained.
8. Boasting as to speed of delivery in a session, such as "I put in Grade 0 in three minutes." Etc.
9. Shortening time of application of auditing for financial or labor-saving considerations.
10. Acting in any way calculated to lose the technology of Dianetics and Scientology to use or impede its use or shorten its materials or its application.

Musical chairs (transfers of persons around an org) is *the single most destructive action to an org's stats*.

A stupid or suppressive person will tear up Division A to get personnel for Division B. These errors are of long duration, and they do more to destroy an org than any other action: (A) Making a hole in one place to remedy a hole in another, (B) Training a person for tech but not admin and putting him in admin, (C) Using the Technical Divisions as personnel pools from which to man other divisions, (D) Rapid shifts of post, (E) Leaving areas in an org unmanned. These personnel errors (or crimes) cause every staff member to suffer in terms of lowered income, lowered pay, lowered facilities, lowered success.

Noise, session interruption. Loud sudden noises, loud bursts of laughter, shouting, whistling, noisy conversation in the area of sessions. As such noises are interruptive of processing, persons making such are to be reported to Ethics. The following penalties will automatically accrue without recourse: One report will be a suspension of training for one week. Two reports will be declaration of the offender as a suppressive person.

Comm cycle additives. There are *no* additives permitted on the auditing comm cycle. It is a serious matter to get a preclear to clarify his answer. It is in fact an Ethics matter and if done habitually is a suppressive act, for it will wipe out all gain.

Withhold of vital information. Obstruction of vital technical or management information lines in such a way as to deny people tech data, prevent students and pcs moving up the Bridge, or obstructing the relay, disclosure or free distribution of vital information so as to prevent its arriving amongst the public and orgs in terms of results.

Informing fellow staff members and others that one is leaving staff. Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an org and does leave (blow) and does not return within a reasonable length of time, an automatic declare is to be issued. Should any monies or organizational property be found to be missing in consequence, action is to be taken on criminal charges.

The following policy violation is the highest crime in Tech or Qual:

Tolerating the absence of or not insisting upon star-rated checkouts on all processes and their immediate technology and on relevant policy letters on HGC interns or staff auditors in the Tech Division or staff auditors or interns in the Qual Division for the levels and actions they will use before permitting them to audit org pcs, and on Supervisors in Tech and Qual who instruct or examine or failing to insist upon this policy or preventing this policy from going into effect or minimizing the checkouts or lists.

Spreading false tales to invalidate Clears or spreading libelous and slanderous statements about the alleged behavior of Clears.

It is a high crime to cut the basic communication lines of Scientology. This includes instances where impedance or negligence denies adequate supply of technical materials to HGC or Qual auditors and to Dianetics or Scientology students.

Knowingly falsifying an auditing report in order to make oneself seem more competent than one is or to hide departures from the Case Supervisor or to omit vital data necessary to case supervising resulting in upsets to a case and time spent in investigation by seniors is actionable by Committee of Evidence, and if the matter is proven beyond reasonable doubt, a cancellation of all certificates and awards, a declare and expulsion order are mandatory.

Permitting in a course room any of the six out-ethics activities listed below is a Committee of Evidence offense, and Supervisors, Directors of Training, Technical Secretaries, Qualifications Secretaries or Ethics Officers so found guilty are subject to declare as a suppressive person.

1. Not mustering students in the morning, after lunch and after dinner, precisely on time, not noting absences and taking action.
2. Permitting students to talk to each other or wander around or take unscheduled breaks or goof off during course hours.
3. Permitting students to eat or smoke in the course room.
4. Permitting persons to come into the course room and bother students for any reason.
5. A Course Supervisor standing around or sitting at his desk not actively handling students who need help.

6. Not getting students through their course and graduated.

Any Case Supervisor case supervising for a level for which he has not been trained is subject to the suspension of all certificates and deprivation of all bonuses as well as refund of all bonuses ever obtained while case supervising, as a Case Supervisor, levels for which he has not been trained above or below his class. This does not limit the penalties which can be applied which can include declare and expulsion.

Any staff member who either verbally or by his actions threatens to crash or deliberately crashes his stats in order to avoid a legal or on-policy order or ethics action is to be instantly declared.

It is a high crime for any staff member to knowingly or unknowingly waste org book stocks or cause them to be wasted or tampered with.

It is further a high crime for a staff member, Bookstore Officer or executive to fail to take the necessary precautions for the protection and correct use of org book stocks.

It is a high crime to publicly depart Scientology.

Any repeated or continued violation of the five points of our study tech listed below, after two Courts of Ethics for violation of these points, subjects the person to a Committee of Evidence on the charge of committing an act or omission undertaken to knowingly suppress, reduce or impede Scientology or Scientologists, and if found guilty beyond reasonable doubt, the person may be declared suppressive and expelled with full penalties:

1. A person may be summoned to a Court of Ethics or Executive Court of Ethics if it be found that he has gone past a word he does not understand when receiving, hearing or reading an order, HCOB, policy letter or tape, any and all LRH written or printed materials including books, PABs, despatches, telexes and mimeo issues which resulted in a failure to do duties of his post, without his at once making an effective effort to clear the words on himself, whether he knew he was missing them or not, as the source of his inaction or damaging actions.

The charge is *neglecting to clarify words not understood*.

2. A staff member who does not use study tech or get it known while studying or instructing may be summoned to a Court of Ethics or an Executive Court of Ethics.

The charge is *failure to employ study tech*.

3. A student alter-ising or misadvising others on the use of study tech may be summoned before a Court of Ethics.

The charge is *advocating a misuse or neglect of proper study tech*.

4. An auditor failing to clear each and every word of every command or list used may be summoned before a Court of Ethics.

The charge is *out-tech*.

5. Any Public Division person, staff member or Scientologist found using terms, circumstances or data on raw public in public lectures or promotion or in PR beyond the public ability to grasp without stressing study tech or at once taking effective measures to clarify, or releasing materials broadly to a wrong public may be summoned to a Court of Ethics if any flap or upset results.

The charge is *failure to apply study tech in dissemination*.

To alter and pervert tech or procedure to prevent discovery of withholds is classified as a suppressive act. This enters many areas: changing or losing issues, issuing issues in Board Technical Bulletin (BTB) or Board Policy Letter (BPL) form that contain incorrect and misleading data, posting known criminals or incompetents to training posts, verbal tech or any action which would prevent tech from being known or correctly used.

Where proven beyond reasonable doubt that funds and business have been diverted from an org to its detriment, a declare order on those responsible is mandatory, and possible criminal prosecution may be undertaken.

Admitting a famous person or notable writer to higher-level processing who has not fully attained lower-level processing. This applies in particular to Power, Clearing Courses and OT Courses.

Failure to strenuously act to clean up an "ARC broken field" shall be deemed a high crime for an Executive Council.

It is a high crime to permit suppressive and PTS people in Publications Orgs or departments or in Department 16C (Division 6A, advertising) as these will starve both the public and the org.

Any executive issuing an order that certain HCO PLs or HCOBs are not to be followed, where this is proven beyond reasonable doubt, shall be considered as having committed a high crime, and this can carry the assignment of the condition of Treason for both the person issuing the order and the person who receives and executes it.

Any auditor seeing a rock slam on a preclear and failing to mark it down and report it is guilty of a high crime, as this injures society, the org and the person himself.

When a preclear has roller-coastered despite a floating needle at session end and at Examiner's and if neither Tech nor Qual makes any effort to remedy, then the matter becomes a high crime.

If red tags, per the Examiner's 24-hour rule, continue unhandled by Tech or Qual, the matter becomes a high crime.

It is a high crime for a Case Supervisor not to WRITE in a preclear's folder what the case supervised instructions are and a high crime for an auditor to accept verbal C/S instructions.

Word clearing any words on any test at any time is a high crime. It suppresses tech results and obscures them.

It is a high crime for a person to supervise a course, who does not know, apply and continually use his study tech on every individual student.

It is also a high crime for a Director of Training or a Tech Sec or an Esto to have anyone supervising without FULL USE OF STUDY TECH.

It is a Committee of Evidence offense for a Case Supervisor or auditor to C/S or accept for processing and process any illegal pc. (Ref: HCOB 6 Dec. 76RB. ILLEGAL PCs, ACCEPTANCE OF, HIGH CRIME BULLETIN)

Feeding the Clear cognition to any individual, evaluating for a pc on this subject or coaxing him to any cognition is criminal and a comm-eable offense. Clears are made through auditing, not by feeding cognitions to pcs.

Declaring a Dianetic Clear "achieved in other practices."

Falsely declaring someone Dianetic Clear who isn't and failing to declare one who made it on Dianetics or the Clearing Course or who has *always* been Clear.

It is a high crime for an executive to penalize auditors, C/Ses, Tech/Qual or Ethics Officers for following HCOBs or HCO PLs, especially when it is due to the executive's withholds. (It is also a high crime to falsely charge an executive with the above.)

Attempting to undermine or advising or encouraging or condoning the abandonment or reduction of use of the full technology of locating and handling overts, evil purposes, destructive intentions and nonsurvival considerations.

Neglecting, advising against the application of, failing to enforce or tolerating the omission of standard Word Clearing and star-rate checkouts on all new or newly revised HCO Policy Letters, as well as the key HCO PLs of the Basic Staff Member Hat and the key policies of the staff member's specific assigned post, by every staff member. In the Sea Organization this applies to LRH CBOs and Flag Orders as well as HCO Policy Letters.

Violation of any of the eleven points listed below which are Admin Degrades:

1. Abbreviating an official course in standard Scientology administrative policy so as to lose the full theory, administrative procedures and effectiveness of the subject.
2. Adding comments to the Org Exec Course or other administrative check-sheets or instructions, policies or directives labeling any material "background" or "not used now" or "old" or "it doesn't need to be followed exactly," or any similar action which will result in the student not knowing, using and applying the standard administrative data in which he is being trained.
3. Employing any checksheet for any administrative course not authorized by the Authority, Verification and Correction Unit International (AVC Int) or, in the case of hat checksheets, duly authorized per HCO PL 30 Sept. 70, CHECKSHEET FORMAT.
4. Failing to strike from any administrative or hat checksheet any such

comments as "historical," "background," "noted," "old," etc., or VERBALLY STATING IT TO STUDENTS.

5. Failing to hat and apprentice a staff member on the full policy and actions of his post.
6. Discouraging or preventing a staff member, administrator or executive from training on the full Org Exec Course and Flag Executive Briefing Course.
7. Failing to insist upon precise and exact application of the Data Series policy letters in investigations and evaluations.
8. Running any organization on squirrel "policy" or third dynamic administrative or management procedures that are contrary to approved policy.
9. Using any squirrel administrative procedure in managing an organization while falsely labeling it Scientology policy.
10. Using Scientology policy but calling it something else or attributing it to some other source.
11. Acting in any way calculated to lose standard Scientology policy to use or impede its use or shorten its materials or its application.

It is a high crime for anyone who has not fully and successfully completed the Hubbard Key to Life Course to supervise or otherwise administer this course to another or others.

Feeding a person the end phenomena of the Hubbard Key to Life Section 2B Clay Table Process is classified as a suppressive act, because it will probably harm his progress and hurt his chances. Penalties for doing so could include expulsion.

Forcing auditing on a pc when he is refusing or protesting it, rather than finding out why the pc doesn't want the auditing and straightening it out is using auditing suppressively. Any C/S or auditor guilty of this must be handled with group justice proceedings which would include a Comm Ev and could include a penalty of being declared suppressive and expelled from the Church.

Additionally, a crime, if severe and of magnitude, harmful to many and committed repeatedly, can be reclassified as a high crime. (See HCO PL 7 Mar. 65RA III. OFFENSES AND PENALTIES, for those actions which classify as crimes.)

Suppressive acts are clearly those covert or overt acts knowingly calculated to reduce or destroy the influence or activities of Scientology or prevent case gains or continued Scientology success and activity on the part of a Scientologist. As persons or groups that would do such a thing act out of self-interest only to the detriment of all others, they cannot be granted the rights ordinarily accorded rational beings.

If a person or a group that has committed a suppressive act comes to his, her or their senses and recants, his, her or their only terminal is the International Justice Chief, via the Continental Justice Chief, who:

17:50 17:50
A. Tells the person or group to stop committing present time overts and to cease all attacks and suppressions so he, she or they can get a case gain;

B. Requires a public announcement to the effect that they realize their actions were ignorant and unfounded and stating where possible the influences or motivations which caused them to attempt to suppress or attack Scientology; gets it signed before witnesses and published broadly, particularly to persons directly influenced or formerly associated with the former offender or offenders. The letter should be calculated to expose any conspiracy to suppress Scientology or the preclear or Scientologist if such existed;

B1. Requires that all debts owed to Scientology organizations or missions are paid off;

B2. May require that, subject to the approval of the International Justice Chief, an amends project suitable and commensurate with the severity and extent of the suppressive acts committed be completed before further A to E steps are undertaken;

Before any such amends project is begun, the person must submit an Amends Project Petition to the International Justice Chief, using full CSW and stating what he proposes to do as amends, and this must be approved by the International Justice Chief to be considered valid. (Ref: HCO PL 1 May 65, STAFF MEMBER REPORTS, and HCO PL 1 May 65 II, ORDER BOARD AND TIME MACHINE) Evidence of genuine ethics change may be required before approval of the amends project is given. (Examples of such evidence might be, depending upon the high crimes committed: the person has obtained an honest job; has paid off all debts owed to others; valid contributions have been made to the community; the person has totally ceased those actions for which he was declared, etc.);

It is also within the power of the International Justice Chief, when approving an Amends Project Petition, to require, as a protector of the Church and its tenets and membership, that such amends project be carried out entirely off any Scientology organization, mission or network lines, and to require, before the amends project may be considered complete, extensive evidence over a protracted period of time that the person has, beyond any doubt, ceased his or her suppressive actions, has created no problems for the Church or any member of the Church in any way on any line, and has undertaken and completed an action which is clearly and undeniably of benefit to mankind;

C. Requires training beginning at the lowest level of the Bridge at their expense if executives in charge of training will have the person or the group members;

D. Makes a note of all of the above matters with copies of the statement and files in the ethics files of those concerned;

E. Informs the International Justice Chief and forwards a duplicate of the original statements which show signatures.

Any potential trouble source owing money to any Scientology organization is handled the same as any other Scientologist. Failure to discharge a financial obligation becomes a civil matter after normal, within-org avenues of collection have been exhausted.

Any PTS who fails to either handle or disconnect from the SP who is making him or her a PTS is, by failing to do so, guilty of a suppressive act.

Civil court action against SPs to effect collection of monies owed may be resorted to, as they are not entitled to Scientology ethics procedures.

Until a suppressive person or group is absolved or until permitted to actively engage in the training required in point C, as duly authorized and published, his, her or their only Scientology terminal is the International Justice Chief via the Continental Justice Chief, or members of a duly authorized and convened Committee of Evidence.

A suppressive declare order upon a person or group and all of the conditions inherent within it remain in force until the order has been officially cancelled by an authorized and published Church issue.

Also, until a suppressive person or group is absolved, but not during the period when the person requests and has a Committee of Evidence, or an amnesty occurs, no Scientology ethics other than this HCO Policy Letter applies to such persons, no Committee of Evidence may be called on any Scientologist or person for any offenses of any kind against the suppressive person except for offenses which violate the laws of the land or except to establish in cases of real dispute whether or not the person was suppressing either Scientology or the Scientologist.

Such persons are in the same category as those whose certificates have been cancelled, and persons whose certificates, classifications and awards have been cancelled are also in this category.

The imagination must not be stretched to place this label on a person. Errors, misdemeanors and crimes do not label a person as a suppressive person or group. Only high crimes do so.

A Committee of Evidence may be called by any convening authority who wishes more concrete evidence of efforts to suppress Scientology or Scientologists, but if such a committee's findings, passed on, establish beyond reasonable doubt suppressive acts, this policy letter applies.

Outright or covert acts knowingly designed to impede or destroy Scientology or Scientologists is what is meant by acts suppressive of Scientology or Scientologists.

The greatest good for the greatest number of dynamics requires that actions destructive of the advance of the many, by Scientology means, overtly or covertly undertaken with the direct target of destroying Scientology as a whole, or a Scientologist in particular, be summarily handled due to the character of the reactive mind and the consequent impulses of the insane or near insane to ruin every chance of mankind via Scientology.

POTENTIAL TROUBLE SOURCE

A Scientologist connected by familial or other ties to a person who is guilty of suppressive acts is known as a potential trouble source or trouble source. The

history of Dianetics and Scientology is strewn with th . Confused by emotional ties, dogged in refusing to give up Scientology, yet invalidated by a suppressive person at every turn, they cannot, having a PTP, make case gains. If they would act with determination one way or the other—reform the suppressive person or otherwise standardly handle the situation—they could then make gains and recover their potential. If they make no determined move, they eventually succumb.

Therefore, this policy letter extends to suppressive non-Scientology wives and husbands and parents, or other family members or hostile groups or even close friends. So long as a wife or husband, father or mother or other family connection, who is attempting to suppress the Scientology spouse or child, or hostile group remains continually acknowledged or in communication with the Scientology spouse or child or member, then that Scientologist or preclear comes under the *family* or *adherent* clause and may not be processed or further trained until he or she has taken appropriate action to cease to be a potential trouble source.

The validity of this policy is borne out by the fact that the US government raids and other troubles were instigated by wives, husbands or parents who were actively suppressing a Scientologist or Scientology or who were acting under the influences of persons or agencies who had deliberately misinformed them regarding Scientology. The suppressed Scientologist did not act in good time to avert the trouble by handling the antagonistic family member.

Any processing of the potential trouble source is denied or illegal while the connection exists, and a person not actively seeking to settle the matter may be subjected to a Committee of Evidence if processed meanwhile.

POTENTIAL TROUBLE SOURCES AND DISCONNECTION

The subject and technology of "disconnection" is thoroughly covered in HCOB 10 Sept. 83, PTSness AND DISCONNECTION, and in the basic technical materials referenced therein.

Unwarranted or threatened disconnection has the recourse of the person or group being disconnected from requesting a Committee of Evidence from the nearest convening authority (or HCO) and producing to the committee any evidence of actual material assistance to Scientology without reservation or bad intent. The committee must be convened if requested.

The real motives of suppressive persons have been traced to quite sordid hidden desires—in one case the wife wanted her husband's death so she could get his money and fought Scientology because it was making the husband spiritually well. Without handling the wife or the connection with the woman, the Scientologist, as family, drifted on with the situation, and the wife was able to cause a near destruction of Scientology in that area by false testimony to the police and government and press. Therefore, this is a serious thing—to tolerate or remain connected to a source of active suppression of a Scientologist or Scientology without standardly handling or acting to expose the true motives behind the hostility and reform the person. No money particularly may be accepted as fee or loan from a person who is "family" to a suppressive person and therefore a potential trouble source. There is no source of trouble in Scientology's history greater than this one for frequency and lack of attention.

Anyone absolved of suppressive acts by an amnesty Committee of Evidence ceases to be declared suppressive. Anyone found guilty of suppressive acts by a Committee of Evidence and its convening authorities remains declared unless saved by an amnesty.

This policy letter is calculated to prevent future distractions of this nature as time goes on.

RIGHTS OF A SUPPRESSIVE PERSON OR GROUP

A truly suppressive person or group has no rights of any kind as Scientologists.

However, a person or group may be falsely labeled a suppressive person or group. Should the person or group claim the label to be false, he, she or they may request a Committee of Evidence via their nearest Continental Justice Chief. The executive with the power to convene a Committee of Evidence must do so if one is requested for recourse or redress of wrongs.

The person or representative of the group labeled suppressive is named as an interested party to the committee. They attend it where it convenes.

The committee must pay attention to any actual evidences that the person or group that is accused of being suppressive may produce, particularly to the effect of having helped Scientology or Scientologists or a Scientologist, and if this is seen to outweigh the accusations, proof or lack of it, the person is absolved.

Any knowingly false testimony, forgeries or false witnesses introduced by the person or group accused of being suppressive can result in an immediate finding against the person or group.

Any effort to use copies of the testimony or findings of a Committee of Evidence called for this purpose or holding it to scorn in a civil court immediately reverses any favorable finding and automatically labels the person or group suppressive.

If the findings, as passed upon by the convening authority and the International Justice Chief, demonstrate guilt, the person or group is so labeled as a suppressive person or group.

Failing to prove guilt of suppressive acts, the committee must recommend to absolve the person or group publicly.

When a person, by some circumstance, has been incorrectly declared, then *after* he has had a Committee of Evidence and the Suppressive Person Declare Order has been cancelled, he may, if he wishes, request a Board of Review who, upon full review of the matter, may if warranted ask for the return of lost pay or status the person may have experienced while incorrectly declared a suppressive person. (Ref: HCO PL 23 Feb. 78R, BOARD OF REVIEW)

RECOURSE OF A POTENTIAL TROUBLE SOURCE

A person labeled a potential trouble source and so barred from receiving auditing, may request a Committee of Evidence of the nearest Continental Justice Chief via HCO as recourse if he or she contests the allegation.

The Committee of Evidence requested must be convened by the nearest convening authority.

If evidences of disconnection are given, the Committee of Evidence findings and recommendations and the convening authority, once the findings are duly approved, must remove the label of potential trouble source from the Scientist. If the alleged suppressive person or group is clearly and beyond reasonable doubt shown not to be guilty of suppressive acts or is shown clearly to have reformed, the Committee of Evidence must recommend removal of the label suppressive person or group from the suspected person or group. However, once a person or group has been declared suppressive by an authorized, published order, the removal or lifting of the declare order or label must be approved by the International Justice Chief.

But should the former potential trouble source's state of case show no gain after reasonable time in processing, any executive of Division 4 (Training and Processing) may order a new Committee of Evidence in the matter, and if it and its convening authority recommend to reverse the former findings, and if such findings are approved on International Justice lines, the labels are applied. But no auditor may be disciplined for auditing either during the period between the two findings.

RECOURSE OF AN AUDITOR

An auditor disciplined for processing a potential trouble source or a suppressive person or a member of a suppressive group may request a Committee of Evidence if he can persuade the potential trouble source and the suppressive person or a representative of the suppressive group to appear before it.

The auditor so requesting may also have named as an interested party or parties with himself the person or persons who supplied the information or misinformation concerning his actions.

No damages or costs may be borne by or ordered by a Committee of Evidence in cases involving potential trouble sources or suppressive persons or groups.

When the potential trouble source or suppressive person or group representative fails to appear before a Committee of Evidence on a bill of particulars labeling persons as potential trouble sources or suppressive persons or groups at the published time of its convening, the bill of particulars stands as proven and the convening authority is bound so to declare.

EVIDENCE OF DISCONNECTION

Any HCO Secretary may receive evidences of disconnection or disavowal and, on finding them to be bona fide, must place copies of such evidences in the ethics file and in the CF folders of all persons named in them.

The disconnecting person then ceases to be a potential trouble source (once any additional PTS handling of a technical nature required by the Case Supervisor has been successfully completed).

The procedure for recanting suppressive person or group is outlined above.

EVIDENCES OF SUPPRESSION

It is wise for any Scientologist, HCO Secretary or Committee of Evidence in matters concerning suppressive acts to obtain valid documents, letters, testimonies duly signed and witnessed, affidavits duly sworn to and other matters and evidences which would have weight in a court of law. Momentary spite, slander suits, charges of Scientology separating families, etc., are then guarded against.

If matters concerning suppressive acts are given good and alert attention, properly enforced, they will greatly accelerate the growth of Scientology and bring a new calmness to its people and organizations and far better case gains where they have not heretofore been easy to achieve.

Preclears with present time problems, ARC broken with associated but suppressive persons, will not obtain case gains but on the contrary may experience great difficulty.

Observance of these facts and disciplines can help us all.

Nothing in this policy letter shall ever or under any circumstances justify any violation of the laws of the land or intentional legal wrongs. Any such offense shall subject the offender to penalties prescribed by law as well as to ethics and justice actions.

L. RON HUBBARD
Founder

Revision assisted by
LRH Technical Research
and Compilations

SEA ORGANIZATION

FLAG CONDITIONS ORDER 6664

18 February 1982

SUPPRESSIVE PERSON DECLARE

GERRY ARMSTRONG

GERRY ARMSTRONG of California is hereby declared a SUPPRESSIVE PERSON for the following Crimes and High Crimes.

1. Violation of HCO PL 7 December 1976 LEAVING AND LEAVES, which states: "Where a person is secretly planning to leave and making private preparations to do so without informing the proper terminals in an org and does leave (blow) and does not return within a reasonable length of time an automatic Declare is to be issued."
2. Spreading destructive rumours about senior Scientologists.
3. Announcing departure from Scientology (but not by reason of leaving an organization, a location or situation or death).

Gerry took an unauthorized leave at Christmas and has refused to return and route out properly, although he has been contacted and requested to do so. Following his blow he has made statements to the effect that he is no longer a Scientologist and that the tech does not work. He has also made derogatory statements to three staff members concerning a Senior Scientologist. Gerry has also stated that people should leave Scientology.

Should Gerry come to his senses and wish to recant, he is to apply steps A-E of HCO PL 16 May 80 Iss III ETHICS, SUPPRESSIVE ACTS, SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS. Should he fail to apply these steps he will be expelled from the Church of Scientology and debarred from Advanced Courses. Should he claim the label to be false, he may request a Committee of Evidence, per the above referenced policy.

His only terminal is the Continental Justice Chief PAC.

PO1 Paul Laquerre
International Justice Chief
Authorized by
AVC
for the
CHURCH OF SCIENTOLOGY
INTERNATIONAL

DEFENDANT'S
EXHIBIT

14
7/26/94

SEA ORGANIZATION

FLAG CONDITIONS ORDER 6664R

18 February 1982
Revised 22.4.82

SUPPRESSIVE PERSON DECLARE

GERRY ARMSTRONG

Armstrong
PFL DEFY EXHIBIT 10
WIT: Farmy
PENNY L. GILMORE, Reporter
F-12-84

GERRY ARMSTRONG, now of Costa Mesa, California, is hereby DECLARE
A SUPPRESSIVE PERSON according to HCO PL 7 Dec 76 LEAVING AND LEAVES:

"Where a person is secretly planning to leave and making private
preparations to do so without informing the proper terminals in an org
and does leave (blow) and does not return within a reasonable length
of time an automatic Declare is to be issued."

Gerry took an unauthorized leave in December 1981 and has refused
to return and route out properly although he has been contacted and
repeatedly requested to do so.

Since Gerry was declared on 18 Feb 1982, reports have been made
that also bring the following charges against him for Crimes and High
Crimes and Suppressive Acts against the Church:

1. THEFT.
2. ILLEGALLY TAKING OR POSSESSING CHURCH PROPERTY.
3. RESELLING ORG MATERIEL FOR PRIVATE GAIN.
4. IMPERSONATING A SCIENTOLOGIST OR STAFF MEMBER WHEN NOT AUTHORIZED
5. FALSIFYING REPORTS.
6. MAKING OUT OR SUBMITTING OR ACCEPTING FALSE PURCHASE ORDERS.
7. JUGGLING ACCOUNTS.
8. OBTAINING LOANS OR MONEY UNDER FALSE PRETENSES.
9. ISSUING THE DATA OR INFORMATION OR INSTRUCTIONAL OR ADMINISTRATIVE
PROCEDURES WITHOUT CREDIT OR FALSELY ASSIGNING CREDIT FOR THEM
TO ANOTHER.
10. ENGAGING IN MALICIOUS RUMOUR-MONGERING TO DESTROY THE AUTHORITY
OR REPUTE OF HIGHER OFFICERS OR THE LEADING NAMES OF SCIENTOLOGY
OR TO "SAFEGUARD" A POSITION.

11. SEEKING TO SPLINTER OFF AN AREA OF SCIENTOLOGY AND DENY IT PROPER CONSTITUTED AUTHORITY FOR PERSONAL PROFIT, PERSONAL POWER OR "TO SAVE THE ORGANIZATION FROM THE HIGHER OFFICERS OF SCIENTOLOGY."
12. PRONOUNCING SCIENTOLOGISTS GUILTY OF THE PRACTICE OF STANDARD SCIENTOLOGY.
13. WILLFUL LOSS OR DESTRUCTION OF CHURCH PROPERTY.
14. HOLDING SCIENTOLOGY MATERIALS OR POLICIES UP TO RIDICULE, CONTEMPT OR SCORN.
15. SPREADING DESTRUCTIVE RUMOURS ABOUT SENIOR SCIENTOLOGISTS.
16. PRETENDING TO EXPRESS A MULTIPLE OPINION (USE OF "EVERYBODY") IN VITAL REPORTS.
17. BEING A KNOWING ACCESSORY TO A SUPPRESSIVE ACT.
18. FAILURE TO HANDLE OR DISAVOW AND DISCONNECT FROM A PERSON DEMONSTRABLY GUILTY OF SUPPRESSIVE ACTS.

Since Gerry Armstrong left the Church, he has falsely represented himself to others and said he was on a "secret mission." Representing himself then as a staff member, he then misrepresented the actions of the Church and its members to others. Gerry has chronically misrepresented himself and others.

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He has spoken out for LSD and LSD-proponent Timothy Leary knowing full well that such illicit drugs are strictly prohibited by the Church and that Church Founder L. Ron Hubbard has written against their usage or promotion due to their destructive nature. Knowing that LRH also has researched and written how to combat the effects of these illicit drugs, Gerry Armstrong has degraded LRH's research and prefers to promote the research of Timothy Leary.

Gerry has taken and sought to sell Church property. He has also failed to return Church property he obtained. He also falsified his Church financial records by failing to state the nature of the intended purchases and failing to spend the money for the approved items. Records by him show purchases for personal items as well as covering the expenses of non-Church companies.

Gerry was also found to be promulgating false information about the Church, its Founder and members. He used his position to create and transmit erroneous information under the guise of "documentation."
Altered documents have been found in his area.

Should Gerry Armstrong come to his senses and wish to recant, he should apply steps A-E of HCO PL 16 May 80 III ETHICS, SUPPRESSIVE ACTS SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS. Should he fail to apply these steps he will be expelled from the Church and be debarred. Should he claim the label or the charges to be false, he may request a Committee of Evidence per the above referenced policy.

His only terminal is the Continental Justice Chief PAC.

PO1 Paul Laquerre
Int Justice Chief

Authorized by AVC

for the

CHURCH OF SCIENTOLOGY
INTERNATIONAL

Armstrong
13
PFL/DEFT EXHIBIT
WIT: *Fanny*
PENNY L. GILMORE, Reporter
7-12-94

FLAG® ED 2830RB

25 July 1992

TO: ALL E/Os ALL ORGS AND MISSIONS

SUPPRESSIVE PERSONS AND SUPPRESSIVE GROUPS LIST

This issue is the list of declared suppressive persons and suppressive groups. It is for your use to safeguard the lines of your Org or Mission and to ensure that these individuals or members of these groups are not connected to or on lines at your Org or Mission in any way. Reference: HCO™ PL 23 December 1965RB, SUPPRESSIVE ACTS, SUPPRESSION OF SCIENTOLOGY AND SCIENTOLOGISTS.

Updates of this list will be regularly circulated as per HCO PL 29 June 1968, ENROLLMENT IN SUPPRESSIVE GROUPS.

In case you have knowledge of any of the listed people being on lines in your org or on lines with any other Scientology® group or Scientologist™, please immediately let me know by telex with all data you have.

Also, in case you have any data that seems to conflict with any person being on this list, or any person that should be listed but is not, please contact me by telex with full specifics.

Sue Porter
INT JUSTICE CHIEF

Authorized by
AVC CMO INTERNATIONAL
EXTENSION UNIT

for
CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:AVCIXU:SEP:sak

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Also, in case you have any data that seems to conflict with any person being on this list, or any person that should be listed but is not, please contact me by telex with full specifics.

Sue Porter
INT JUSTICE CHIEF

Authorized by
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EXTENSION UNIT

for
CHURCH OF SCIENTOLOGY
INTERNATIONAL

CSI:AVCIXU:SEP:sak

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ALPHABETICALLY

- ELMIRA
- E-METER THERAPY
- ENLIGHTENMENT INTENSIVES
- ESSENCE OF LIFE
- ESOTERIC RESEARCH AND EDUCATION FOUNDATION
 - a.k.a. CENTER FOR ESOTERIC PSYCHOLOGY, THE
- ESOTERIC RESEARCH FOUNDATION
 - a.k.a. CENTER FOR ESOTERIC PSYCHOLOGY, THE

- EST (EMERSON SEMINAR TRAINING)
- EST PHOENIX AREA CENTER
- EST LA AREA CENTER
- EST NEW PORT BEACH AREA CENTER
- EST SACRAMENTO AREA CENTER
- EST SAN DIEGO AREA CENTER
- EST SAN FRANCISCO AREA CENTER
- EST SAN JOSE AREA CENTER
- EST DENVER AREA CENTER
- EST CONNECTICUT AREA CENTER
- EST WASHINGTON DC AREA
- EST MIAMI AREA CENTER
- EST SARASOTA AREA CENTER
- EST TAMPA AREA CENTER
- EST ATLANTA AREA CENTER
- EST HAWAII AREA CENTER
- EST CHICAGO AREA CENTER
- EST NEW ORLEANS AREA CENTER
- EST BOSTON AREA CENTER
- EST DETROIT AREA CENTER
- EST MINNEAPOLIS/ST PAUL AREA CENTER
- EST NEW JERSEY AREA CENTER
- EST ALBUQUERQUE AREA CENTER
- EST NEW YORK AREA CENTER
- EST CHARLOTTE AREA CENTER
- EST CINCINNATI AREA CENTER
- EST CLEVELAND AREA CENTER
- EST PORTLAND AREA CENTER
- EST PHILADELPHIA AREA CENTER
- EST PITTSBURGH AREA CENTER
- EST DALLAS AREA CENTER
- EST HOUSTON AREA CENTER
- EST SEATTLE AREA CENTER
- EST WEST COAST SITE (SANTA ROSA, CALIFORNIA)

- EUNANTICS
- EXCALIBUR
- EXEGESIS
- FAST CLEARING
- FELLOWSHIP OF CLEAR LIGHT
- FELLOWSHIP OF CLEARING CONSULTANTS
- FIELD, THE
- FIELD GROUP, THE
- FORENINGER FOR ANVENDT FILOSOFI
 - (Association for applied philosophy)
- FORENINGER FOR TILLAEMPAO FILOSOFI
 - (Association of applied philosophy)
- FORUM, THE
- FOUNDATION OF ADVANCED ABILITIES
- FOUNDATION CHURCH OF THE MILLENNIUM, THE
- FREE ZONE SCIENTOLOGY
 - a.k.a. CREATIVE LEARNING CENTER
- FRIENDS OF THE 1ST AMENDMENT
- GALACTIC PATROL
- GENERAL PSYCHIC
- GESTALT INSTITUTE
- GREEN CLUB
- GROWING OLDER, INC.
- HARMONISTICS
- HARMONY WORKSHOP
- HARTFORD CENTER
- HEALTH AND ABILITY CENTER BRIGHTON
- HERMAIET
- HIGHTONE INTERVIEWS
- HOLISTIC CENTER FOR HIGHER AWARENESS
- HOLLYWOOD DIANETICS
 - a.k.a. CALIFORNIA ASSOCIATION OF DIANETIC AUDITORS (CADA)
- HOLY ORDER OF MAJIS
- HONEY DROP FOUNDATION
- HUB, THE
- HUBBARD DIANETIC CONTROL CENTER
 - a.k.a. HOLLYWOOD DIANETICS
- HUMAN INRIGIT GROUP
- HUMAN POTENTIAL CENTER
- HUMAN POTENTIAL MOVEMENT
- HUMA RESEARCH ASSOCIATES
- HUNGER PROJECT, THE
- I AM

- INSTITUTE OF PSYCHOLOGY & PARAPSYCHOLOGY
- INTERNATIONAL AWARENESS CENTER
- INTERNATIONAL COMMUNICATION NETWORK
- INTERNATIONAL DIANETIC SOCIETY, INC.
 - a.k.a. HOLLYWOOD DIANETICS
- INTERNATIONAL SOCIETY OF INDEPENDENTS
- INTROSPECTIVE TECHNOLOGY SERVICES
- INTUITOLOGY
- ISM OF AM
- KRIPALU SCHOOL OF SAIJAI YOG
- KENJA
 - a.k.a. KENJA PERSONAL ABILITY CENTRE AND PERSONAL EVOLVEMENT CENTRE
- LEAGUE FOR SPIRITUAL DISCOVERY
- LIFE AID
- LIFE ARTS CENTER
 - a.k.a. CHURCH OF SCIOLOGOS
 - a.k.a. CENTER FOR ADVANCEMENT OF HUMAN POTENTIAL
- LIFE DYNAMICS
- LIFE MANAGEMENT TRAINING CENTER
- LIFE REPAIR
- LIFESPING
- LIFE TECH, INC.
 - a.k.a. LIFE TEK
- LIVING LOVE CENTER
- LONDON INDEPENDENT AUDITORS NETWORK
- M-TECH
- MAJKEN, LILLIAN AND CO.
- MENTAT SCHOOL INC., THE
- METCALF GROUP
- MIAMI ABILITY CENTER
 - a.k.a. CHURCH OF SPIRITUAL ADVANCEMENT
- MIND CLEARING
- MIND DYNAMICS
- MIND EXPANSION
- MIND SCANNING
- MIND SPA, THE
- MOREHOUSE
- MOTIVATIONS BERATUNG SCHMITTLER
 - (Organization motivation center)
- MUNA
- NATURAL LEARNING CENTER
- NATURALISM
- NEW PRINCIPLES
- NEXUS NEW AGE CIVILIZATION CENTER
- NIMBIN OVERSPACE FELLOWSHIP
- NORMANHOLOGY
 - a.k.a. POWER
- NOUVEAU MIND CENTER
- NOW SALES TRAINING
- OMEGA TRAINING
 - a.k.a. OMEGA CONSULTANT TRAINING
 - a.k.a. OMEGA CLEARING
- ONTOLOGY
 - a.k.a. UNIVERSAL INSTITUTE OF APPLIED ONTOLOGY
- OPERATION SAFESPACE
- ORGANIZATION MOTIVATION CENTER
- ORIENTOLOGY
- O.T. ASSOCIATES
- OT CENTRAL COMMITTEE WORLD WIDE
- PACE PROGRAM
- PALO ALTO ABILITY CENTER
- PARADIGM TECHNOLOGIES
 - a.k.a. CENTER OF ADVANCED BUSINESS CONCEPTS
- PERSONAL ACTUALISATION TRAINING (PAT)
- PERSONAL COUNSELOR, INC.
- PERSONAL CREATIVE FOUNDATION
- PERSONAL CREATIVE FREEDOM FOUNDATION
- PERSONAL DEVELOPMENT TRAINING
- PERSONAL EFFICIENCY CENTER
- PERSONAL POWER AND TRAINING CENTER
- PERSONAL INTEGRATION THERAPY
- PHILBERT
- POSSUM PROCESS
- POWER
 - a.k.a. NORMANHOLOGY
- POWER PROCESSING
- POWER LEADERSHIP INTERNATIONAL
- PRIMAL SCREAM
 - a.k.a. PRIMAL THERAPY
- PRIMAL FEELING CENTER OF NEW ENGLAND
- PROCESS, THE
 - a.k.a. PROCESS CHURCH OF THE FINAL JUDGMENT
- PROCESS CHURCH
- PROJECT SAFESPACE
 - a.k.a. SAFESPACE
- PROMETEO GROUP
- PROSPEROS, THE
- PROSPEROUS INNER SPACE CENTER

EST (ERUARD SEMINAR TRAINING):
 EST PHOENIX AREA CENTER
 EST LA AREA CENTER
 EST NEW PORT BEACH AREA CZ.
 EST SACRAMENTO AREA CENTER
 EST SAN DIEGO AREA CENTER
 EST SAN FRANCISCO AREA CENTER
 EST SAN JOSE AREA CENTER
 EST DENVER AREA CENTER
 EST CONNECTICUT AREA CENTER
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- EXEGESIS
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- FELLOWSHIP OF CLEARING CONSULTANTS
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- HARMONY WORKSHOP
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 AUDITORS (CADA)
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- HONEY DROP FOUNDATION
- HUB, THE
- HUBBARD DIANETIC CONTROL CENTER
 a.k.a. HOLLYWOOD DIANETICS
- HUMAN INRIGHT GROUP
- HUMAN POTENTIAL CENTER
- HUMAN POTENTIAL MOVEMENT
- HUMA RESEARCH ASSOCIATES
- HUNGER PROJECT, THE
- I AM
- IF
- IMPROVEMENT GAME, THE
- INDEPENDENT LEGAL FUND
- INDEPENDENT RELIGIOUS SERVICE ASSOCIATION, THE
- INDEPENDENT SCIENTOLOGISTS IN SUNDERLAND
 a.k.a. CLEAR CENTER SUNDERLAND
- INDEPENDENTS SFO
- INNER SPACE CENTER
- INSIGHT DYNAMICS
- INSTITUT FUR ANGEWANDTE KOMMUNIKATION
 a.k.a. ABILITY CENTER VIENNA
- INSTITUT FUR BEWISSTSEINS FORSCHUNG
 (Institute for mental research)
- INSTITUTE FOR APPLIED COMMUNICATION
 a.k.a. ABILITY CENTER VIENNA
- INSTITUTE FOR THE DEVELOPMENT OF THE HARMONIOUS
 HUMAN BEINGS
- INSTITUTE FOR PERSONAL EXCELLENCE
- INSTITUTE FOR PERSONNEL ENHANCEMENT
- INSTITUTE FOR RESEARCH IN METAPSYCHOLOGY
- INSTITUTE OF ABILITY
- INSTITUTE OF ACTUALIZATION
- INSTITUTE OF ADVANCED PERCEPTION
- INSTITUTE OF APPLIED TECHNOLOGY
- INSTITUTE OF HUMAN ABILITIES
 a.k.a. MOREHOUSE
- a.k.a. TURN ON TO AMERICA
- INSTITUTE OF INTERPERSONAL COMMITMENT
- INSTITUTE OF PAST LIFE THERAPY

ISM OF AM
 KRIPALU SCHOOL OF SAHAJ YOG
 KENJA
 a.k.a. KE PERSONAL ABILITY CENTRE AND PERSONAL
 EVL MENT CENTRE
 • LEAGUE FOR SPIRITUAL DISCOVERY
 • LIFE AID
 • LIFE ARTS CENTER
 a.k.a. CHURCH OF SCIOLOGOS
 a.k.a. CENTER FOR ADVANCEMENT OF HUMAN POTENTIAL
 • LIFE DYNAMICS
 • LIFE MANAGEMENT TRAINING CENTER
 • LIFE REPAIR
 • LIFESPRIING
 • LIFE TECH, INC.
 a.k.a. LIFE TEK
 • LIVING LOVE CENTER
 • LONDON INDEPENDENT AUDITORS NETWORK
 • M-TECH
 • MAJKEH, LILLIAN AND CO.
 • MENTAT SCHOOL INC., THE
 • METCALF GROUP
 • MIAMI ABILITY CENTER
 • a.k.a. CHURCH OF SPIRITUAL ADVANCEMENT
 • MIND CLEARING
 • MIND DYNAMICS
 • MIND EXPANSION
 • MIND SCANNING
 • MIND SPA, THE
 • MOREHOUSE
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 • NORMANOLOGY
 • a.k.a. POWER
 • NOUVEAU MIND CENTER
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 • OMEGA TRAINING
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 • a.k.a. PROCESS CHURCH OF THE FINAL JUDGMENT
 • PROCESS CHURCH
 • PROJECT SAFESPACE
 • a.k.a. SAFESPACE
 • PROMETEO GROUP
 • PROSPEROUS, THE
 • PROSPEROUS INNER SPACE CENTER
 • PSI-WORLD
 • PSYCHIC SPIRITUAL ADVANCEMENT
 • RANDOMITY
 • READING RESEARCH COUNCIL
 • REALIZATION CENTER
 • a.k.a. CENTER FOR REALIZATION OF CREATIVE POTENTIAL
 • RE-EVALUATION COUNSELLING APPLIED PHILOSOPHY
 • REFORM CHURCH OF SCIENTOLOGY
 • a.k.a. DIANOLOGY
 • REFORMED CHURCH OF SAN DIEGO
 • REFORM CHURCH OF SCIENTOLOGY
 • RE-INCARNATION COUNSELLING
 • REVITALIZATION CENTER
 • RUSSELL SCOTT CLEARING
 • SAFESPACE
 • a.k.a. SAFESPACE FOUNDATION
 • a.k.a. PROJECT SAFESPACE
 • SAGE
 • SAHAJ YOG
 • ST. ETIENNE AND CLERMONT FERRAND GROUP
 • SANATANA DHARMA FOUNDATION
 • SCHOOL OF ATHOLOGY
 • SCHOOL OF SACRED SCIENCE
 • SCIENCE OF THOUGHT
 • SCIENTOLOGY ELMIRA
 • a.k.a. CREATIVE LEARNING CENTER
 • SCIOGNOSTICS
 • SCIO-SOCIETY INTERNATIONAL

ATTACHMENT

- SEDONA INSTITUTE
- SEEKERS AFTER TRUTH
- SELF DETERMINISM SERVICES
- SELF DISCOVERY: THE BASIC AGREEMENT
- SELF EXPERIENCE AUDITING
- SELF PURSUIT
- SELF REALISATION
- SELF-REALISATION FELLOWSHIP (SRF)
- SELF TRANSFORMATION
- SHAKTI
- SHAKTI-PAT
- SILINGLER SCHMITZER
- SOUTH-WEST LONDON CENTRE
- SPIRITUAL AWARENESS CENTER
- SPIRITUAL ECOLOGY
- SPIRITUAL ENERGY
- SPIRITUAL HOLISTIC EDUCATION FOUNDATION
- STELLE BROTHERHOOD
- STEVE MURO & ASSOCIATES
- STILLE INFORMATION CENTER
- SUM INSTITUTE
 - a.k.a. SUM SEMINARS
- SURVIVAL SERVICES INTERNATIONAL
- SYNERGETICS SOCIETY
 - a.k.a. SYNERGETICS
 - a.k.a. SYNERGOS PSI
- SYNERGY
- TAGOSHII
- TAKE COMMAND
- TECH-MATERIAL-SERVICE
- THREE & THE LIGHT CENTER
- THETA CLEARING
- THETA COMMUNICATIONS
- THETA INTERNATIONAL
- THETA SEATTLE
- TOGETHER TRAINING
- TOTALITY
- TRAINING OF NEW MEXICO
- TRANSCENDENTAL DIANETIC
- TRICHOTOMY
- TRINITOLOGY
- TRILOGY
- TURN ON TO AMERICA
 - a.k.a. INSTITUTE OF HUMAN ABILITIES
- UNIVERSAL CHURCH OF ETERNAL PHETAM
- UNIVERSAL INSTITUTE OF APPLIED ONTOLOGY
 - a.k.a. ONTOLOGY
- VACUUM CLEANING PROCEDURE
- VICTORIAN COLLEGE OF ESOTERIC STUDIES
- VIPERS
- WERASTATT FUR HOLISTISCHES LEBEN
- WERNER ERHART AND ASSOCIATES
- WHOLE TRACK DESIGNS
- WINNINGS ADVANCED MANAGEMENT TECHNOLOGY
 - a.k.a. ABILITY CENTER VIENNA
- WISDOM SCHOOL
- WORLD SOCIETY FOR EVERYMAN'S FREEDOM
- WUD-SHA-LO
- YES
- YES
- YMI
- YEMITH APPLIED PHILOSOPHY (YAP)

DECLARED SUPPRESSIVE PERSONS:

AARON, DAVID
ADEL, SUSAN
AEGG, BERNHARDT
AEGG, PAUL
ADELINO, DINO
ASBERG, VALLE
ACOSTA, MICHAEL D.
ACS, GABE
ACS, KENNY
ADAIR, JANE GEORGINA
ADAMI, VITO
ADAMS, BRENDA
ADAMS, CHUCK
ADAMS, GERALD
ADAMS, KARIN
ADAMS, MARY LUELLA
ADAMS, MICK
ADAMS, RODNEY
ADCOCK, AL
ADELSTEIN, LYNN
ADEN, DAVID (MARTIN)
ADLER, DARRY
AFGHANI, USOMA

ALLEN, TIM
ALLEVI, LIDIA
ALLMARAS, LINDA
ALLOI, ROGER
ALMARAS, DAVE
ALMSLAD, ROBERT
ALPEN, CINDY
ALPIN, MICK
ALPIN, VAL
ALVAREZ, ALEJANDRO
ALVAREZ, GEORGE
ALVAREZ, JOSE
ALVES, JOELLE
ANDALUS, ALFREDO
ANDERSON, BORJE
ANDERSON, EDYTHE
ANDERSON, JAMES
ANDERSON, KIM
ANDERSON, MARILYN
ANDERSON, PAUL
ANDERSSON, MONIKA
ANDRAZ, RANDALL
ANDREU, GEORGES
ANDREWS, ROBYN (LAVEGLIA)
ANDRUS, ALISON LOUISE
ANSTRIN, LISA
ARGUE, MIKE
ARJANA, MARIO

BAILEY, TURC
BAKER, MARK
BAKER, NEIL
BALDIZON, GERMAN DANIEL
BALLARD, ERIC
BAHIRO, ADENIYI
BANGERT, BAHIRO MITCH
BANKSTON, PEGGY
BARAKAT, TERRY
BARDARO, PAUL
BARDEN, ERIC
BARSEN, MARIA
BARBER, DAN
BARBER, GLEN
BARBERO, ENRICA
BARBIER, JEAN LUC
BARDOSA, DAVID
BAREA, IDA
BANGER, DALE
BARKER, BRIAN
BARNES, GARY
BARNETT, SUE
BARNHE, CARL
BARROW, DAVID
BARROW, CYRIL
BARRY, KIM
BARTON, JACK

BENTZ, ORLANDO
BERGERON, CHISLAINE M.
BERNARD, DOMINIQUE M.
BERNARD, HELENA
BERNDTSSON, BARBERO
BERRY, BRITA
BERTINATO, GINA
BERTOJA, ELISABETH
BESKE, CINDY
BETTENDORF, DANIEL JOHN
BIARGAV, SUIAS
BIDSTRUP-LARSEN, FRANK
BILLINGS, SHIRLEY
BINDA, DJ
BINDA, MIKE TERRANCE
BISBY, STEVE
BISHOP, BONNY
BISHOP, BRUCE
BLACKWOOD, DAVID
BLANCHET, MANON
BLOCK, TERRY
BLUM, PETER
BOCK, SHELLEY
BODINIER, FRANCOIS
BODINIER, ESTHER
BOLDEN, SHERRY ANN
BOLINGER, TRUMAN

- SHAKTI
- SHAKTI-PAT
- SILINGLER SCHMITZER
- SOUTH-WEST LONDON CENTRE
- SPIRITUAL AWARENESS CENTER
- SPIRITUAL ECOLOGY
- SPIRITUAL ENERGY
- SPIRITUAL HOLISTIC EDUCATION FOUNDATION
- STILLE BROTHERHOOD
- STEVE MURO & ASSOCIATES
- STILLE INFORMATION CENTER
- SUN INSTITUTE
 - a.k.a. SUN SEMINARS
- SURVIVAL SERVICES INTERNATIONAL
- SYNERGETICS SOCIETY
 - a.k.a. SYNERGETICS
 - a.k.a. SYNERGOS PSI
- SYNERGY
- TAGOSHI
- TAKE COMMAND
- TECH-MATERIAL-SERVICE
- THEE & THE LIGHT CENTER
- THETA CLEARING
- THETA COMMUNICATIONS
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- WISDOM SCHOOL
- WORLD SOCIETY FOR EVERYMAN'S FREEDOM
- WUD-SHA-LO
- YES
- YMI
- YEMITH APPLIED PHILOSOPHY (IAP)

DECLARED SUPPRESSIVE PERSONS:

AARON, DAVID
 ADEL, SUSAN
 ADEGG, DERNADETTE
 ADEGG, PAUL
 ADELING, DINO
 ABERG, VALLE
 ACOSTA, MICHAEL D.
 ACS, GABE
 ACS, KENNY
 ADAIR, JANE GEORGINA
 ADAMI, VITO
 ADAMS, BRENDA
 ADAMS, CHUCK
 ADAMS, GERALD
 ADAMS, KARIN
 ADAMS, MARY LUELLA
 ADAMS, HICK
 ADAMS, RODNEY
 ADCOCK, AL
 ADELSTEIN, LYNN
 ADEN, DAVID (MARTIN)
 ADLER, DARRY
 AFGHANI, USOMA
 AHMED, HANID
 AILLS, RITA
 AKESSON, KAJ
 AKESSON, LENA
 AKITA, ANGEL RAHIREZ
 ALACK, JOHN
 ALBA, RENE
 ALBACH, DARBAJA
 ALBACH, JANELLE
 ALBARCABA, JAIHE
 ALDER, ERWIN
 ALDER, VIRGINIA
 ALDRICH, CYNTHIA
 ALEXANDER, GERALD
 ALEXANDER, JOHN
 ALEXANDER, PAUL
 ALLA, MIKE
 ALLARD, JOHN
 ALLEMAN, BRIAN
 ALLEMAN, JAN
 ALLEMAN, STEVE
 ALLEN, CHRISTOPHER
 ALLEN, DON
 ALLEN, JIM
 ALLEN, MARCUS
 ALLEN, NETTA
 ALLEN, PAT

ALLEN, TIM
 ALLEVI, LIDIA
 ALLMARAS, LINDA
 ALLOI, ROGER
 ALMARAI, DAVE
 ALMSLAD, ROBERT
 ALPEN, CINDY
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 ALVAREZ, GEORGE
 ALVAREZ, JOSE
 ALVES, JOELLE
 ANDALUS, ALFREDO
 ANDERSON, BORJE
 ANDERSON, EDYTHE
 ANDERSON, JAMES
 ANDERSON, KIM
 ANDERSON, MARILYN
 ANDERSON, PAUL
 ANDERSSON, MONIKA
 ANDRAE, RANDALL
 ANDREU, GEORGES
 ANDREWS, ROBYN (LAVEGLIA)
 ANDRUS, ALISON LOUISE
 ANSTRIN, LISA
 ARGUE, MIKE
 ARIANA, MARIO
 ARMISTEAD, TOM
 ARMSTRONG, GERRY
 ARMSTRONG, MIKE
 ARMSTRONG, SUE
 ARNOLD, PETER
 ARNOLD, SHELLY
 ASKEW, CARL
 ASKEW, MORGAN
 ATACK, JON
 AU, AMY
 AUERBACH, CASS
 AUERBACH, DAN
 AUSLEY, JOHN
 AVALLE, ANGELA
 AXLEDY, RODNEY
 AZARES, DECKY
 AZHARAN, RICK
 AZHARAN, VICKI
 BAABAA, MAHFOOZ
 BAADAA, ANN
 BADENDREIEF
 BACRYMAN, JIM RAMSEY
 BACON, ART
 BADE, JOHN
 BAFR, CHRIS
 DAGLEY, KATHY
 BAILEY, MIKE

BAILEY, TURC
 BAKER, MARK
 BAKER, NEIL
 BALDION, GERMAN DANIEL
 BALLARD, ERIC
 BAMIRO, ADENIYI
 BANGERT, BAMIRO MITCH
 BANKSTON, PEGGY
 BARAKAT, TERRY
 BARDARO, PAUL
 BARDEH, ERIC
 BARDEH, MARIA
 BARBER, DAN
 BARBER, GLEN
 BARBERO, ENRICA
 BARBIER, JEAN LUC
 BARDOSA, DAVID
 BAREA, IDA
 BANGER, DALE
 BARKER, BRIAN
 BARNES, GARY
 BARNETT, SUE
 BARNEY, CARL
 BARROW, DAVID
 BARROW, CYRIL
 BARRY, KIM
 BARTON, JACK
 BARTON, HOEL
 BASSETTO, ELIO
 BATH, DAVID
 BATTAGLIA, DOUG RALPH
 BAUDAR, CATHERINE (MC CLURE)
 BAUGH, WEBB
 BAUMGARTEN, LISA
 BAY-JESPERSEN, KAI
 BAY-JESPERSEN, VICKY
 BEALE, DAVID
 BEALS, SUZANNE
 BEAULIEU, DIANE
 BEAUMONT, STEVE
 BECHIS, ERIC
 BECK, CHRIS
 BECK, YVONNE
 DELL, JULIAN
 DELLARDI, CRISTINA
 BELLMAINE, HORAG
 DELLOTTI, VINCENZO
 BELTRAN, RUBEN
 BENGTSSON, KARI
 BENNETT, LISA
 BENSON, RICK
 BENSON, RONLYN ANNE
 BENTLEY, HAROLD
 BENTLEY, MARGARET

BENTZ, ORLANDO
 BERGERON, GISELAINE M.
 BERNARD, DOMINIQUE M.
 BERNARD, HELENA
 BERNOTSSON, BARBRO
 BERRY, BRITA
 BERTINATO, GINA
 BERTOJA, ELISABETH
 BESKE, CINDY
 BETTENDORF, DANIEL JOHN
 BIHARGAV, SUHAS
 BIDSTRUP-LARSEN, FRANK
 BILLINGS, SHIRLEY
 BINDA, DJ
 BINDA, MIKE TERRANCE
 BISBY, STEVE
 BISHOP, BONNY
 BISHOP, BRUCE
 BLACKWOOD, DAVID
 BLANCHET, MANON
 BLOCK, TERRY
 BLUM, PETER
 BOCK, SHELLY
 BODINIER, FRANCOIS
 BODINIER, ESTHER
 BOLDEN, SHERRY ANN
 BOLINGER, TRUMAN
 BOLTON, LEN
 DOMHEL, SANDRA (RETI)
 BONCHER, CLARENCE
 BOND, IRENE
 BONFANTI, FABIO
 BONNAFOUS, MADELINE
 BONNING, HEATHER
 BONO, MARTY
 BORDEN, SUSAN
 BORGLIN, CHRIS
 BORRE, HAIKEN
 BORTHWICK, GWYNNE
 BORTHWICK, JOHN
 DOSS, RICK
 BOSTROM, JOHN
 BOSNABA, ROGER
 BOTHA, MARTIN
 DOTTAN, GRAZIANO
 BOTTARO, RENATA
 BOU, FERNANDO SALA
 BOUCK, MIKI
 BOUDERBA, MOHAMED
 DOULDING, RORY
 DOULDING, SHERRY
 BOULTON, SUE
 BOURGOIN, ANN ELLA
 BOURGOIN, GUY CAMIL
 BOUSARJAR, JULIE

מחלקת המחקר והפיתוח
מחלקת המכשירים והציוד

DOW, BILLY
 DOW, FRED
 DOWA, ADELINIZ
 DOWA, JOHN
 DOWEN, JIM
 DOWERS, MAJCE (HARRIS)
 DOX, RALPH
 DOYER, JOHN
 DOYER, LITA
 DRABLET, JOHN
 DRAIDY, KEVIN GRANT
 DRAIDY, DANIEL
 DRAIDY, CAMLA
 DRAIDENBURG, JEFF
 DRAIDES, CINDY
 DRAIDERS, RICHARD
 DRAKE, RON
 DRICARD, MARIE CHRISTINE
 DROD, TRACY
 DRODIE, DANIELLE
 DRODIE, DUNCAN
 DRODIE, JILL
 BROWN, CHRIS
 BROWN, GAIL (GORDO)
 DROWN, SCOTT
 DROWNFIELD, JOE
 DRUHEAU, DANIEL
 DRUNNET, PAUL
 DRUSCH, BRUNETTA
 DRUSCHER, MAURIZIO
 BURN, REN
 BURNI, GIANCOLO
 BUCKMAN, ALAN
 BUCKMAN, EILEEN
 BUCKMAN, SCOTT EVERETT
 BUCKMEIER, BRAD
 BUCKLES, CATHY
 BUD, BRADLEY (BARNESLEY)
 BUDCH, DEBBIE
 BUDEN, TOMMY
 BUDICK, GEORGE
 BURET, NICK
 BURGESS, HELEN
 BURK, LARRY DON
 BURK, GRETCHEN
 BURKE, CHRIS
 BURNETT, CARL
 BURNETT, RICHARD
 BURKOWSKIS, EVA
 BURKOWSKIS, RAYMOND
 DURWELL, LITA
 DUSHLING, LINA
 BUSHMAN, ED
 BUS, ANNIE (ELLIS)
 BUTLER, BILL
 BUTLER, HAROLD
 BYRNE, CHRIS
 BYRNE, JANE
 CAMON, JOHN PAUL
 CACLY, DEBBIE
 CALDWELL, SADRINA
 CALDWELL, BRUCE
 CALDWELL, NICKI
 CALLEGARINI, PAUSTO
 CALVO, SYLVIA
 CANVAS, CLAUDIA
 CANVAS, WALTER
 CANINI, GIANINI
 CAPOLANTE, FRANK
 CAPUTO, RIZZO
 CAPUTO, RICHARD
 CAPUTO, FERNANDO
 CAMOTAKI, CATHY
 CARLISLE, CRICKET
 CARLSEN, CARL
 CARLSEN, HOLLY
 CARNOVA, IRENE
 CARNEY, SHERI
 CANNITE, DAN
 CANNARA, ROBERT
 CANNIERE, CHRISTAL
 CANNIERE, FRANKCOIS
 CANNIN, TONY
 CASE, ANN
 CASILLAS, ED
 CASSMAN, CHRISTAL
 CASSISA, PETER MARTIN
 CASILLO, ALAN
 CASILLO, MANUE

[illegible]

DE JONG, NANCY
DE JONG, LUCIE
DE KACIJA, ANTONELLA
DE MARCO, GIULIO
DE PISTONO, BERNARD
DE PISTONO, MARIE THERESE
DE ROSA, DEBORA
DE VITI, MARIA
DEAN, CHUCK
DEARING, MICHAEL
DECARLE, BILL
DECHERT, GENE
DECHERT, GENE
DEISSCH, BILL
DELAUNAY, NUNO
DELAY, ERIC
DELEY, MIKE
DELOLIO, MICHELLE
DEHNING, KELLAN
DEHNISON, KELLAN
DEHNISON, MELISSA
DEHNISON, REGINA
DEHNISON, TERRY
DEHNISON, OR
DEHNOCH, GEORGE (EDDIE)
DESHAYIS, CLAUDINE
DEUTSCHER, SUE
DEUTSCHER, BILL
DEUTSCHER, WANDA
DEUTSCHER, BEN
DEUTSCHER, FRANCESCA
DILLIT, JOE
DINCALCI, JIM
DINCALCI, MARCO
DOBSON, MARK
DOZAGERS, DAVE
DOHERTY, BETTY
DOHERTY, ELIZABETH ANN
DOHIVAY, SAM
DOHIVAY, MOIRA
DOUGHERTY, JANE
DOUGLAS, KIM
DOVNER, DREDA
DOVNER, VIRGINIA
DOVNER, MARION K.
DOVNER, LORETTA
DOVNER, RON
DOVNER, BERNIE (GUY)
DOVNER, JEAN-PAUL
DULZ, JOHN
DUMAS, FRANCIS
DUMAS, CHIRIS (LADSON)
DUNCAN, MALCOLM
DUNCAN, SYLVIA
DUNK, CHRIS
DUNLOP, DAVID
DUNN, YVY
DUNN, LARRY
DUNSTAL, MICHELLE
DUNSTON, MARCO
DUNSTON, MARK
DYER, JEANNE
DYER, KEN
DYER, EDWIN R.
EARLE, GARY
EASTMAN, BARBARA
EASTMAN, MIKE
EDEN, TERRY
EDEN, JACK
EDLER, MICHELLE
EDWARDS, ANDREA
EDWARDS, JACQUE
EDWARDS, KEN
EGGER, PATRICIA
EILANDER, BERNARD
EILANDER, LOUIS JOSEPH
EILANDER, RICHARD
EILANDER, LUCIE
EILANDER, NANCY

OSCAR OSCAMILLA,
L25
E33LAND,
DILLARD
EUBANKS,
WILKINSON
JON EZZARETTI,
PAUL FADER,
MANCI FADER,
RANDY FADER,
FABRIS, FREDERICA
PAOLO FACHINETTI,
MIRIT FAIR,
SALTIT FAIR,
MURRAY FAIRMANAKS,
GUYLIA FAIRMANAKS,
EMMA FALZON,
EVANS M. FAREED,
ARIF FARUK,
KIM JEFFERY FARUK,
L25LIE YAMZ FARUK,
MARRY FARUK,
CARLO FARRU,
KATHI FASITER,
PETE FASITER,
MICHAUD FAVO,
MICHAEL FELDMAN,
FELDMAN,
RAYMOND FELDMAN,
CLAUDE FELDMAN,
ANTHONY FELDMAN,
PENNY FELTON,
NELSON FELTAD,
LOURDES FELMIRIA,
JOHN FELMIRIA,
ISABELLA FELMIRIA,
ALBERTO FELMIRIA,
JUANITA FELMIRIA,
HOMER FELMIRIA,
STEEZ FELMIRIA,
OLIVER FELMIRIA,
DR. BENZ FELDZ,
ANDREA FELDZ,
DANCE FELDZ,
GROFF FELDZ,
VALENTINE (CORTMAN) FILLER,
MATT FILLER,
JIM FILLER,
DETTY FINCH,
DAVID FINOLAY,
KIRSTEN FINOLAY,
DAVE FINOLAY,
DREW FINLEY,
MARTHA FINLEY,
JANET FISCHER,
NICHARD FISCHER,
BETTY FISHER,
JOHN FISHER,
MARK CHRISTIAN FISHER,
PATIE FISHER,
FISHER, ROBERT WILLIAM JAMES
SUE FISHER,
GABRIELLE FISHER,
MARCUS FISHER,
STEVE FISHER,
JOHNNY FJAL,
KAYLA FJALL,
SCOTT FLETCHER,
HOWARD (BUDDY) FLOOD,
RAY FLORES,
ANTONIO FLORES,
GUILLERMO FLORES,
DIONANNA FLORES,
MARIO FLORES,
JOHN FLORES,
MICK FLORES,
WELBERT (FURST) FLORES,
LUIZA FOIS,
JOEY FOIS,

DOYER, LETA
 DRADLEY, JOHN
 DRADY, KEVIN GRANT
 BRAGG, DARYL
 BRAID, CARLA
 BRANDENBURG, JEFF
 BRANDES, CINDY
 BRANDES, RICHARD
 BREKKE, RON
 BRICARD, MARIE CHRISTINE
 BROD, TRACY
 BRODIE, DANIELLE
 BRODIE, DUNCAN
 BRODIE, JILL
 BROWN, CHRIS
 BROWN, GAIL (GERDO)
 BROWN, SCOTT
 BROWNFIELD, JOE
 BRUNEAU, DANIEL
 BRUNELLE, PAH
 BRUSCHI, BRUNELLA
 BRUZZONE, MAURIZIO
 BUNKE, KEN
 BUCCHI, GIACOMO
 BUCHANAN, ALAN
 BUCHANAN, EILEEN
 BUCHANAN, SCOTT EVERETT
 BUCHHEIM, BRAD
 BUCKLES, CATHY
 BUDD, SANDRA (BARNESLEY)
 BURCH, DEBBIE
 BURDEN, TONYA
 BURDICK, GEORGE
 BUREY, NICK
 BURGESS, HELEN
 BURK, LARRY DON
 BURKE, GRETCHEN
 BURNE, CHRIS
 BURNETT, CARYL
 BURNETT, RICHARD
 BURROUGHS, EVA
 BURROWES, SARAH
 DURWELL, LYLE
 DUSHLING, TINA
 BUSHMAN, ED
 BUSS, ANNIE (ELLIOT)
 BUTLER, BILL
 BUTLER, HAROLD
 BYWIE, CHRIS
 BYRNES, JANE
 CARON, JOHN PAUL
 CAGLE, DEBBIE
 CALDAGNETTO, SABINA
 CALDWELL, BRUCE
 CALDWELL, NICKI
 CALLEGARINI, FAUSTO
 CALVO, SYLVIE
 CAMAS, CLAUDIA
 CAMAS, WALTER
 CANUTI, GIANNI
 CAPOHIALE, FRANK
 CAPUTO, PIERO
 CAPUTO, RICARDO
 CARAIO, FERNANDO
 CARIOTAKI, CATHY
 CARLISLE, CRICKET
 CARLSEN, CARL
 CARLSEN, HOLLY
 CARMONA, HECTOR
 CARNEY, SHERI
 CARWITE, DAN
 CARARA, ROBERT
 CARRIERE, CHANTAL
 CARRIERE, FRANCOIS
 CARTER, TERI
 CASE, AMY
 CASILLAS, ED
 CASSAN, CHANTAL
 CASSISA, PETER MARTIN
 CASTILLO, ALEX
 CASTILLO, MAUDE
 CATANO, MIGUEL
 CATANO, MIGUEL ALFONSO
 CATHIE, ANGUS
 CAUFIELD, JOE
 CAULKINS, STEVE
 CEBALLOS, ALVARO
 CENEDELLA, LUIGI
 CERNIGOI, SILVANO
 CHADSEY, TERRY
 CHANAL, JESSE
 CHALEFF, IRA
 CHALHOT, NICOLE
 CHAMBERLAIN, NEVILLE
 CHAMBERS, BRETT
 CHARLEDOIS, CHANG MARGIE
 CHARLETON, PAM
 CHASE, BERT
 CHAUVET, JENNY
 CHAVARRIA, JAVIER
 CHAVARRIA, JOSE SALVADOR
 CHAVARRIA, THERESE
 CHEN, MURIEL
 CHENIER, ED
 CHERVIN, MARC
 CHESNEY, CAROL
 CHIAREZZA, GIUSEPPINA
 CHIARI, SILVIA

CLARK, FRANKIE
 CLARK, KELI
 CLARK, LOTTI
 CLEARY, JIM
 CLEMENTE, ISABELLE
 CLIFFORD, SCOTT
 COBURN, CAROL
 COE, GURRY M.
 COESSER, KEITH
 COHEN, PAULETTE
 COHEN, SHELLY
 COHEN, VIRGINIA
 COLEMAN, RICHARD
 COLL, CONCHITA
 COLLINS, JIM
 COLOMBO, LUIGI
 COLOSIMO, CARLO
 CONAGHAN, MATTHEW JAMES
 CONDRON, RON
 CONNOR, DOUG
 CONNORS, NOEL
 CONRAD, LINDA
 CONTRERAS, TERESA
 CONWAY, JILL
 COOK, GORDON
 COOK, YVONNE
 COONS, MARC
 COOPER, DARYL
 COOPMAN, GEORGE
 CORDES, CHRIS
 CORDOVA, CARLOS
 CORTEZ, DAVID
 CORYDON, BERT
 CORYDON, MARY
 COSTA, MONICA
 COULTER, KEITH L.
 COULTER, RITA DIANE
 COVELL, JOHN
 COVELL, SANDY
 CRAGGS, DEREK
 CRAMMER, LINDA
 CRAMMER, TED
 CREAMER, CECILIA
 CREAMER, NEIL
 CREEGAN, DANIEL
 CRISTIAN, GUNTHER
 CRITTENDON, CLAIRE
 CRIVELLO, AL
 CROSIGNANI, ALBERTO
 CROSIGNANI, PAOLA
 CROSSMAN, ELIZABETH
 CROW, SCOTT
 CROWDER, ROBERT
 CROWIE, HARVEY
 CROWIE, JASANTA
 CRUNDALL, MARTIN
 CRUZ, JESUS
 CUBISOL, JEAN NOEL
 CURL, GERRIE
 CURREN, TERENCE
 CURREN, TERRANCE
 CUSWORTH, DAVID
 CRAINZINGER, LEO
 D'AGNELLI, GIANNI
 D'AMATO, UGO
 D'AMICO, TONY
 D'AUDEY, DOUG
 DABLIN, ANN MAI
 DAGNEAU, MARC
 DAILY, MICHAEL J.
 DAL PRA, GABRIELLA
 DALE, ROD
 DALTON, JIM
 DAN, DAFNA (ROBERTSON)
 DANA, MICHELLE
 DANIELE, RAGGI
 DANIELS, EDO
 DANMAN, TOD
 DANTES, VERO
 DARE, BERNARD
 DARE, CHRIS
 DAROESHMAN, PEGGY
 DAROSS, MARY
 DASQUET, JULIA (DARCONDO)
 DAVEY, ROD
 DAVIDSON, DELWYN
 DAVIDSON, MIKE
 DAVIES, CHRISTOPHER L.
 DAVIES, DR STEPHEN
 DAVIS, ALICE
 DAVIS, BREN
 DAVIS, CARMIT
 DAVIS, CHRIS
 DAVIS, DEB
 DAVIS, JEFF
 DAVIS, NICK STEPHEN
 DAVIS, RON
 DAVIS, R. DELL
 DAVIS, E
 DAVIS, CHEN
 DAWSON, ER
 DE, MONNEY
 DE, RICHARD
 DE BRADANDERE, PHILIPPE
 DE FRETAS, MADELINE
 DE GRASSI, ALESSANDRO
 DE GROOT, LUIS
 DE HOMBRE, ALF
 DE JONG, ADRIAN

DEAN, ATHENA
 DEAN, CHUCK
 DEARING, JUEL
 DECARLE, JUEL
 DECHEFF, YL
 DECHEFF, GENE
 DEITSCH, BILL
 DELAUNAY, DRUGO
 DELAY, ERIN
 DELIA, MIKE
 DELLOLO, MICHELE
 DENNING, KELLEN
 DENNISON, MELISSA
 DENNISON, REGINA
 DENNISON, TERRY
 DEREMIO, OM
 DEROGHA, EDWARD (EDDIE)
 DESERRER, HELENE
 DESHAIS, CLAUDINE
 DEUTSCHER, SUE
 DEXTER, DIANA
 DEZELLE, ROCKY
 DIANA, ENJO
 DIANNE, CLAUDE GUY
 DICK, BRUCE
 DICKMAN, DOUG
 DICKSON, WOODY
 DIEBACHER, HANS
 DIEDRICHSEN, BERT
 DILECCE, FRANCESCO
 DILLEY, JOE
 DIMCALCI, JIM
 DIMCALCI, NANCY
 DOBSON, MARK
 DOERGES, DAVE
 DOMERTY, BETTY
 DOMERTY, ELIZABETH FREN
 DOWRE, DOUG
 DONALD, SAM
 DONOVAN, MOIRA
 DOUGHERTY, PAMELA
 DOUGLAS, KIMA
 DOWNES, DRENDA
 DOWNSDOROUGH, VIRGINIA
 DREHER, MARION K.
 DRENNEN, LORETTA
 DRUMMOND, RON
 DUBOIS, BERNIE (GUY)
 DUBREIL, JEAN-PAUL
 DUFOUR, TOM
 DULZ, JOHN
 DUMAS, FRANCOIS
 DUMSICK, CHRIS (LARSON)
 DUKEAN, MAICOM
 DUNCAN, SYLVIA
 DUNK, CHRIS
 DUNLOP, DAVID
 DUINN, AMY
 DUINN, LARRY
 DUHSTAN, MICHELE
 DURHENDER, MARGIT ADELE
 DUTOIT, JUNE
 DUTTON, MARK
 DYER, JEANNE
 DYERS, KEN
 DYKEMA, EDWIN R.
 EADE, DON
 EARLE, GARY
 EASTMAN, BARBARA
 EASTMAN, MIKE
 EDEN, TERRI
 EDKINS, JACK
 EDLER, RICH
 EDMUNDSON, ANDREA
 EDWARDS, JACKIE
 EDWARDS, KEN
 EGGER, PATRICIA
 EIFLANDER, BERN
 EISENHING, ALOIS JOSEPH
 EISENHING, KATHERIN
 EK, CURT
 ELDER, RICHARD
 ELGARDT, DOROTHY
 ELIA, ADOLFO
 ELIA, ROBERTO
 ELISABETTA, BERTOJA
 ELLESTON, MARSHA
 ELLIOT, ANNIE (BUSS)
 ELLIOT, JOHN
 ELLIOT, LINK
 ELLIOT, LYNN
 ELLIOT, TOM
 ELLIOTT, JOHN
 ELLIS, TIM JAMES WILLIAM
 ELLSWORTH, JENNY
 ELTRINGHAM, HANNA (WHITFIELD)
 ELY, TIM
 ELZINGER, BERT
 ENGART, LENNART
 ENGELFLORECHT, ANDRE
 ENGLISH, HOWARD
 ENNIS, SONIA
 ENRIQUEZ, PEDRO
 EPP, MARTA
 ERHARD, WERNER
 ERLICH, DENNIS
 ERLICH, ROSA
 ERIST, ED

FADER, HANCI
 FADER, RANDY
 FABRIS, FREDERICA
 FACCHINETTI, PAOLO
 FAIER, MIRIT
 FAIR, SALLY
 FAIRDANKS, MURRAY
 FAIRDANKS, SYLVIA
 FALION, ENIA
 FARDER, EVANS W.
 FAREED, ARIF
 FARROW, JEFFERY KIM
 FARROW, LESLIE ANNE
 FARROW, MARY JANE
 FARRU, CARLO
 FASTERT, KATHY
 FASTERT, PETE
 FAU, RICARD
 FAULKNER, JACK
 FEARON, GEORGE
 FEHR, DRENDA
 FEILD, RESHAD
 FELDMAN, MICHAEL
 FELDMERSE, ELISABETH
 FELLI, ALESSANDRO
 FELLOWS, RAYMOND
 FELTRIN, CLAUDE
 FEMMINIS, ANTONELLA
 FENTON, PENNY
 FERRADJ, BELKACEM
 FERREIRA, LOURDES
 FERREIRA, MARC
 FERRELL, JOHN
 FERRER, ISABELLA
 FERRERO, ALBERTO
 FERRIS, EVAN
 FERRO, JUANITA
 FERRY, MONICA
 FERRY, STEVE
 FEUGA, OLIVIER
 FIDSDALE, DR. BERT
 FIEDLER, ANDREA
 FIELDS, BRUCE
 FIDERT, GEOF
 FILISKY, VALENIE (ORTMAN)
 FILLER, MATT
 FILREIS, JIM
 FINCH, BETTY
 FINDLAY, DAVID
 FINDLAY, KIRSTEN
 FINGERS, DAVE
 FINLEY, DREW
 FINLEY, MARTHA
 FINCHER, JANET
 FISCHER, RICHARD
 FISHER, BETTY
 FISHER, JOHN
 FISHER, MARK CHRISTIAN
 FISHER, PATTIE
 FISHER, ROBERT WILLIAM
 FISHER, SUE
 FISIMAN, GABRIELLE
 FISIMAN, MARCUS
 FISIMAN, STEVE
 FJAL, JOHNNY
 FJALL, KAIJA
 FLEETHAM, SCOTT
 FLETCHER, HOWARD (BUDDY)
 FLOOD, PAM
 FLORES, ANTONIO
 FLORES, GUILLERMO
 FLORIAN, GIOVANNA
 FLORIDI, MARIO
 FLOURNOY, JOHN
 FLOWER, MARY
 FLOWER, NICK
 FOERSTEL, MELBERT (FURST)
 FOERSTEL, MELBA (FURSTEL)
 FOIS, LAURA
 FOIS, LUISA
 FOLEY, INEZ
 FORD, BRUCE
 FORDE, PETER
 FORSES, GRAHAM
 FORSTNER, ROLAND
 FOSDICK, MIKE
 FOSTER, LEWIS
 FOSTER, MARK JULYAN
 FOSTER, PATTY
 FOUCHE, JOCELYNE
 FOUCHE, KERRY
 FOX, ANTHONY
 FOX, DAVID
 FOXNESS, SHIONA
 FRACASSETTI, MARTINA ERNES
 FRACASSETTI, TIZIANO
 FRANK, MARIANNE
 FRANKLIN, PAUL
 FRANKLIN, PHYLLIS
 FRANKS, BILL
 FRANCISCO, ALFRED
 FRANK, KATHI
 FRASSINETTI, MARCO
 FRATTO, PINO JO
 FREEDMAN, FRANKIE
 FREEMAN, JOAN TARAJO
 FREITAS, MIGUEL
 FREY, MARLYS

FRITH, MARYANN
FRITZ, ERICH
FRITZLER, FRED
FRONER, LUCIE
FROKJAER, TOM
FROKJAR, KRISTIA
FUHRMAN, ANDREA
FUHRMAN, LARRY
FULLER, LOUISE
FULLER, MEL
FULLERTON, ANGELA
FULLERTON, CECILIA
FUNK, LINDA
FURNELL, WAYNE
FURSTEL, HELBERT (FOERSTEL)
FURSTEL, HELGA (FOERSTEL)
FYKE, RICHARD
GABLEHOUSE, LEE
GAGNEMAN, JERRY
GAJEWSKI, COLIN
GALLAGHER, RON
GALLAGHER, ROSS
GALLANT, JOHN
GALLO, CHARLES
GALLOWAY, JIM
GALPIN, JULIA
GALUSHA, JOHN
GAMDOA, FERNANDO
GAMDOA, TERRI
GANGGEL, RUDOLPH
GARCIA, CECILIA
GARCIA, JANICE
GARCIA, RICHARDO
GARCIA, ROBERTO
GARD, ANNIE
GARNER, CHARLES
GARONNE, JAROM
GARRAWAY, ROB
GARRITY, PAUL
GARRITANO, SILVANA
GARRITY, CAROL
GATLING, AL
GAYNES, DENTON JR.
GAYNES, HARDY
GEARON, RICHARD THOMAS
GEE, JON
GELINAS, YVON
GENOVESE, ELIO
GENTRY, BRAD
GERBO, GAIL (BROWN)
GERBODE, SARGE
GERIS, JOHN
GERSTROM, OLE
GERVASONI, PIERANGELO
GHEZZI, CLAUDIO
GHIN, ANTONELLA
GHIONI, FABIO
GHIONI, LUIGI
GIACOSE, RICH
GIANLUCA, GIANLUCA
GIBSON, JAM
GIBSON, STEVE
GIL, PEDRO
GIL, SANDRA
GILBERT, DENNO
GILBERT, EMILE
GILBERT, JAM
GILBERT, PHILIP
GILES, KINGSLEY
GILMAN, JOHN
GILL, DAVID
GILL, DYLAN
GILLETTE, KEVIN
GILLIAM, DOREEN SMITH
GILLIAM, PETER JR.
GILLIAM, JOHN
GINDEY, WAYNE
GIORDANO, LEDA
GIORDANO, SARA
GLASSFORD, JOHNATHAN
GLEASON, KERRY
GLENH, MIKE
GLUCK, ESTHER
GLUCK, EVELYN ANN
GODING, JIM
GODING, MARSHA ELLEN
GOLDBERG, JED
GOLDEN, MICHAEL
GOLDFIELD, EMILY
GOLDFIELD, STEVE
GOLDSTEIN, MIKE
GOLDSTEIN, REBECCA
GONNET, ROGER
GONZALES, GIOVANNI
GONZALES, PABLO
GONZALEZ, GENARO
GONZALEZ, REBECCA DIAZ
GOODMAN, JILL
GOODMAN, RANDY
GOODRICH, ANN
GOODWIN, PETER
GORDON, LORI
GORDON, MILT
GORDON, HILTON
GORDON, PATRICK
GORDON, ROBERT
GOSBELL, PETER
GOTOH, AKIRA DR.

GRASSLE, CRAIG
GRAHAM, DAVID GRIFFITH
GRAHAM, KATH
GRAHAM, MICHAEL
GRAHAM, PAM
GRAHADA, RENZO
GRANT, JIM
GRANT, JULIE
GRANT, PETER
GRAHAM, DIANE
GRAHAM, PATT
GRAY, LES
GREAVES, JUNE
GREEN, BERNIE
GREEN, PETER
GREEN, RICK
GREENE, BERNIE
GREENE, DORAN
GREENE, JEANIE
GREENE, PETER
GREENHANTLE, STEVE
GREGORY, CALVIN
GREIG, DAVID
GREIVE, GARY
GRIFFEN, GUS
GRIFFITHS, PETER
GRIMES, BRIAN
GRIMES, JULIE
GRISWOLD, EILEEN
GROENHUIZEN, FRITZ
GROSS, ERIC
GROSSET, OLIVER
GROSSMANN, HELENE
GROVERS, PETER
GUERIN, JOE
GUILDEAULT, BRIAN
GUILLEMIN, MARIE MOELLE
GUINMAN, TONY
GUSTA, DENISE
GUSTA, MATTHEW
GUY, ALISTAIR
GUY, BERNIE (DUBOIS)
GUY, COLIN
GUY, EWAN
GUY, JEAN-PAUL
HAADER, BLAKE
HABER, DONNA
HABER, HARVEY
HABIB, PAT
HACHER, ALLEN
HACKER, FRED
HADDFIELD, ANTHONY
HAGEN, MARIANNE
HAGHAZARIAN, VIKI
HAHN, KLAUS
HALD, TOMMY
HALFORD, ELENA
HALL, CINDY KAY
HALL, EVERET V.
HALL, KEVIN MICHAEL
HALL, STEPHEN
HALONEN, GARY
HAMAJI, MARY
HAMILTON, BILL
HAMILTON, MATT
HAMILTON, STARR HARVEY
HAMILTON, VIBEKE
HAMLIN, AVERY
HAMMILL, NEIL
HAMMONS, SHAWN
HANCOCK, DAVID
HANCOCK, KEVIN
HANLEY, HEATHER
HANLEY, RAY
HANLEY, BILL
HANLEY, CAROLINE
HANLEY, JOHN
HANSEN, ARDEN
HANSEN, DIANNA
HANSEN, KJELD KINZI
HANSON, JEANNIE
HANSON, NOEL
HANSEN, JEANNIE
HARDY, RICK
HARE, JAMES
HARRIS, DON
HARKER, BILL
HARKER, LESLIE
HARMAN, RAY
HAROD, HERB
HARPER, LEN
HARNELL, DRUCE
HARRIS, ARNOLD
HARRIS, CAROL THOMAS
HARRIS, JONAH
HARRIS, TRAVERS
HARRISON, HUGH
HARRISON, MARK
HARRIVAN, MELISSA
HART, MAUREEN
HARVEY, CRAIG
HASLAM, SANDRA
HASLAM, STEVE (NEED)
HASSELMINGER, CHANTALE
HASSELBERGER, SUSAN
HASTING, BILL
HAUG, RALF
HAWLEY, KEN
HAWLEY, NANCY

HEDDECOCK, MIKE
HEEDE, FRITZ
HEID, MARY
HEIDERER, I
HEINRICHEYE, LUDGER
HEINS, ELLA
HEISER, DAVID
HELFENBERGER, VIRGINIA
HENDERSON, NELSON
HENDERSON, SABRINA
HENDRICKS, CRAIG
HENNING, DAN
HENSON, ROGER
HENWOOD, DAVID ROSS
HENWOOD, ELAINE
HEPNER, NORM
HEREFORD, CHARLES
HERMANN, ARNOLD
HERMANN, SYLVIE
HERMANS, KARL
HERMANS, KATHY
HERNANDEZ, AGAPITO
HERNANDEZ, LESLIE
HERNANDEZ, MARIO JR.
HEYMAN, JOCIM
HIATT, WARREN
HIGGOTT, CAROL
HILL, BOB
HILL, ERIC SHAWN GILLIS
HILL, GRANT
HILL, JUDY
HILL, SALLY LOUISE
HILL, VAL
HILLARD, THEO
HILTON, RALPH
HILTON, RICK
HINDMARSH, GINNY
HIRSHBERGER, TORSTEN
HITOM, RICK
HOBEL, ARLYN
HOBEL, GENE GAIL
HOFER, MARTIN
HOFER, SUSI
HOFFMAN, MARGIE
HOGAN, IAN
HOGBERG, ULF
HOLLAND, GAIL
HOLLANDS, BRETT
HOLLELEY, PETER
HOLLIDAY, CARL
HOLLOWAY, DEBBIE BELL
HOLLOWAY, DON C.
HOLMES, DOUG
HOLMES, LINDA
HOLMSHO, ALAN
HOLROW, PAUL
HOME, ULLI
HOMER, BERNARD
HOOD, DOUGLAS
HOOKER, DONNY
HOONG, ALAN CHOCK
HOPKINS, RON
HOPKINS, SUSAN
HORN, ERNST
HORNFR, JACK
HORNROCKS, KAREN
HORSTEDT, ROY
HORVATIC, TRACEY
HOTTOIS, PHILIPPE
HOTTOIS, TERESA
HOVERSON, SIG
HOWARD, STEVE
HOWARD, WALT
HOWE, BERNICE
HOXIE, BETH ANN
HUDDARD, GREG
HUDDARD, RICHARD
HUBER, FRANK
HUCKER, CHRISTINE
HUFFMAN, BLAKE
HUGHES, DICK
HUGHES, KEN
HUGHES, RICHARD
HUNT, MARTIN
HUNT, PAGE
HUNTER, REX
HURST, HAN
HURTADO, FRANK
HURWITZ, JAY
HURWITZ, PAM
HUSS, MILLIE
HUTCHERSON, MATT
HUTCHINS, WAYNE
HUTCHINSON, DAWN
HUTSON, MIKE
HUTTON, KIM (TAYLOR)
ILICH, ROBERT
IMBURGIA, PETER
IMPNEY, CYNTHIA
ISRAELSON, PRESTON
ISMAOLA, MARTIN
JACKSON, ADRIENNE
JACKSON, CHARLES
JACKSON, CLARISSE
JACKSON, KEVIN
JACKSON, TERRY ANN
JACET, LAUREL
JACOB, RICHARD
JACOBI, MONIKA

JAMER, LARS
JAMSEN, LOTHAR
JANSEN, DERRIT
JANSEN, CHRISTINE
JANSEN, JAMINE
JARAMILLO, DUANE
JAROM, TOM
JARRETT, SCOTT
JARVA, HARRIET
JASNOCK, DEANE
JASSO, ANNETTE KELLY
JEFFERSON, TOM
JELLISON, CECIL "DON"
JENKINS, ROD
JENKINSON, ARTHUR
JENNINGS, LESLIE
JENNINGS, MARGARET
JENSEN, LARRY
JENSEN, DONNA
JENIEN, DOMINO R.
JEPSON, GARY
JERLING, CARA
JERLING, FRANCESCA
JERLING, KARA
JESSUP, AMOS
JESSUP, ARIEL
JESSUP, DALY
JESSUP, JAM
JIMENEZ, JOSE ANTONIO
JIMENEZ, ONDINA
JOHANSEN, JOHNNY
JOHANSEN, OJVID
JOHANSEN, ARNE
JOHANSSON, LESLIE
JOHNSON, JULIE
JOHNSON, LAMONT
JOHNSON, MARK
JOHNSON, MATTHEW
JONES, BOB
JONES, HARDY
JONES, JAMES "ROLI"
JONES, MARK
JONES, RORY
JOHNSON, BOO
JORDAN, DAVID
JORDAN, JULIE
JORY, DONAHUE
JOYCE, TOM
JUELICH, BAKDI
JUELICH, ED
KALAPUS, LARRY
KANDA, CAROL ANN
KAPLAN, STEVEN E.
KARAGIANHIS, DIMITRI
KARAS, DAVID
KATHARY, DALE
KATKE, TOM
KAWALLER, PAUL
KAY, ROB
KAYSER, JOE
KEAT, DAVID
KEAT, URSULA
KEATING, SANDRA KATHERINE
(VOSS)
KEATY, JEFF
KEELEN, DON
KEELER, DAVID
KEELER, DON
KELDERS, ANDRE
KELLY, DESS
KELLY, CHARLES
KELLY, DENNIS
KELLY, MIKE
KELLY, PATRICIA
KELLY, QUENTIN
KEMMER, JAMIE
KEMP, DAVID
KEMP, PAM
KEMP, RAY
KEMPF, STEPHEN P.S.J.
KEON, GWEN
KERN, LORI
KERR, GUS
KERSHAW, DORIS
KERSHAW, JOHN
KESSLER, STEPHEN EDWARD
KETTERIDGE, GLYNN
KEYES, KEN
KIALIPA, MICHEL
KIEFER, DORTHE
KIEFER, MATHIAS
KIENE, IRMGARD
KIING, JIM
KIMNACH, DON
KING, CHRISTINA
KING, FRANCIS
KING, JOE
KIHINES, LARRY
KINNINGER, RICHARD
KIRBY, SADRINA
KIRK, KEITH
KIRKLAND, DAVID
KIRN, HERBIE
KIRVES, JOUKO
KJOLSETH, FLORENCE
KJOLSETH, JOHN
KLEIN, GEORGE
KLEND, CHRIS
KLIN, ARLENE
KLINGVALL, LIESE

ATTACHMENT

FRIAS, JOSE LUIS
FRIEBERG, DENOT
FRIEDRICHSEN, SANDI
FRIEND, ROXANNE
FRIES, CALEN
FRIESE, PHIL
FRIETAS, MIGUEL
FRIGERI, DITORE
FRISK-WASSAETHEN, CECILIA
FRITH, MARYANN
FRITSCH, ERICH
FRITZER, FRED
FRORER, LUCIE
FROKJAR, TOM
FROKJAR, KRYSIA
FUHRMAN, ANDREA
FUHRMAN, LARRY
FULLER, LOUISE
FULLER, MEL
FULLERTON, ANGELA
FULLERTON, CECILIA
FUNK, LINDA
FURNELL, WAYNE
FURSTEL, HELBERT (FOERSTEL)
FURSTEL, HELGA (FOERSTEL)
FYKE, RICHARD
GABLEHOUSE, LEE
GAGNIHAN, JERRY
GAJEWSKI, COLIN
GALLAGHER, RON
GALLAGHER, ROSS
GALLANT, JOHN
GALLO, CHARLES
GALLOWAY, IAN
GALPIN, JULIA
GALUSHA, JOHN
GAMDOA, FERNANDO
GAMDOA, TERRI
GANGGEL, RUDOLPH
GARCIA, CECILIA
GARCIA, JANICE
GARCIA, RICHARDO
GARCIA, ROBERTO
GARD, ANNIEKA
GARHNER, CHARLES
GARONNE, JARON
GARRAWAY, ROB
GARRIETY, PAUL
GARRITANO, SILVANA
GARRITT, CAROL
GATLING, AL
GAYNES, DEBTON JR.
GAYNES, HARDY
GEARON, RICHARD THOMAS
GEE, JON
GELINAS, YVON
GENOVESE, ELIO
GENTRY, BRAD
GERBO, GAIL (BROWN)
GERBODE, SARGE
GERIS, JOHN
GERSTROM, OLE
GERVASONI, PIERANGELO
GHEZZI, CLAUDIO
GHIN, ANTONELLA
GHIONI, FABIO
GHIONI, LUIGI
GIACOSE, RICH
GIANLUCA, GIANLUCA
GIBSON, JAM
GIBSON, STEVE
GIL, PEDRO
GIL, SANDRA
GILBERT, DENNO
GILBERT, EMILE
GILBERT, JAM
GILBERT, PHILIP
GILES, KINGSLEY
GILMAN, JOHN
GILL, DAVID
GILL, DYLAN
GILLETTE, KEVIN
GILLIAM, DOREEN SMITH
GILLIAM, PETER JR.
GILLIAM, JOHN
GIMDEY, WAYNE
GIORDANO, LEDA
GIORDANO, SARA
GLASSFORD, JOHNATHAN
GLEASON, KERRY

GOTTFRIED, RANDY
GOTTLIEB, AUBREY
GOULD, YVONNE
GOULETTE, FABRICE
GRACE, MARILYN
GRADY, DALE
GRADY, JANICE
GRADY, PAUL
GRAESSLE, CRAIG
GRAHAM, DAVID GRIFFITH
GRAHAM, KATH
GRAHAM, MICHAEL
GRAHAM, PAM
GRANADA, RENZO
GRANT, JIM
GRANT, JULIE
GRANT, PETER
GRANTHAM, DIANE
GRANTHAM, PATT
GRAY, LES
GREAVES, JUNE
GREEN, BERNIE
GREEN, PETER
GREEN, RICK
GREENE, BERNIE
GREENE, DORAN
GREENE, JEANIE
GREENE, PETER
GREENMANTLE, STEVE
GREGORY, CALVIN
GREIG, DAVID
GREIVE, GARY
GRIFFEN, GUS
GRIFFITHS, PETER
GRIMES, BRIAN
GRIMES, JULIE
GRISWOLD, EILEEN
GROENHUIJZEN, FRITZ
GROSS, ERIC
GROSSET, OLIVER
GROSSMANN, HELENE
GROVERS, PETER
GUERIN, JOE
GUILDEAULT, BRIAN
GUILLEMIN, MARIE NOELLE
GUINWAN, TONY
GUSTA, DENISE
GUSTA, MATTHEW
GUY, ALISTAIR
GUY, BERNIE (DUBOIS)
GUY, COLIN
GUY, EMAN
GUY, JEAN-PAUL
HADER, BLAKE
HABER, DONNA
HABER, HARVEY
HABIB, PAT
HACHER, ALLEN
HACKER, FRED
HADDFIELD, ANTHONY
HAGEN, MARIANNE
HAGNAZARIAN, VIKI
HAHN, KLAUS
HALD, TOMMY
HALFORD, ELENA
HALL, CINDY KAY
HALL, EVERET V.
HALL, KEVIN MICHAEL
HALL, STEPHEN
HALONEN, GARY
HAMAJI, MARY
HAMILTON, BILL
HAMILTON, MATT
HAMILTON, STARR HARVEY
HAMILTON, VIBEKE
HAMLIN, AVERY
HAMMILL, NEIL
HAMMONS, SHAWN
HANCOCK, DAVID
HANCOCK, KEVIN
HANEY, HEATHER
HANEY, RAY
HANLEY, BILL
HANLEY, CAROLINE
HANLEY, JOHN
HANSEN, ARDEN
HANSEN, DIANNA
HANSEN, KJELD KINZI
HANSON, JEANNIE
HANSON, NOEL

HAY, GEORGE
HAYES, GREGORY EUGENE
HAZEL, INEZ
HAZELWOOD, GERRY
HAZELWOOD, TONI
HEARST, HANCY (DOWERS KUGLER)
HECHE, ADAM
HEDGECOCK, MIKE
HEEDE, FRITZ
HEID, MANFRED
HEIDERER, MAX
HEINRICHMEYER, LUDGER
HEIMS, ELLA
HEISER, DAVID
HELFFENBERGER, VIRGINIA
HENDERSON, NELSON
HENDERSON, SABRINA
HENDRICKS, CRAIG
HENNING, DAN
HENSON, ROGER
HENWOOD, DAVID ROSS
HENWOOD, ELAINE
HEPHER, NORM
HEREFORD, CHARLES
HERMANN, ARNOLD
HERMANN, SYLVIE
HERMANS, KARL
HERMANS, KATHY
HERMANDEZ, AGAPITO
HERMANDEZ, LESLIE
HERMANDEZ, MARIO JR.
HEYHANS, JOCIM
HIATT, WARREN
HIGGOTT, CAROL
HILL, BOB
HILL, ERIC SHAWN GILLIS
HILL, GRANT
HILL, JUDY
HILL, SALLY LOUISE
HILL, VAL
HILLARD, THEO
HILTON, RALPH
HILTON, RICK
HINDMARSH, GINNY
HIRSHERBERGER, TORSTEN
HITOM, RICK
HOBEL, ARLYN
HOBEL, GENE GAIL
HOFFER, MARTIN
HOFFER, SUSI
HOFFMAN, MARGIE
HOGAN, IAN
HOGBERG, ULF
HOLLAND, GAIL
HOLLANDS, BRETT
HOLLELEY, PETER
HOLLIDAY, CARL
HOLLOWAY, DEBBIE BELL
HOLLOWAY, DON C.
HOLMES, DOUG
HOLMES, LINDA
HOLMSHO, ALAN
HOLMOW, PAUL
HOME, ULLI
HOMIER, BERNARD
HOOD, DOUGLAS
HOOKER, DONNY
HOONG, ALAN CHOCK
HOPKINS, RON
HOPKINS, SUSAN
HORN, ERNST
HORNHER, JACK
HORNROCKS, KAREN
HORSTEDT, ROY
HORVATIC, TRACEY
HOTTOIS, PHILIPPE
HOTTOIS, TERESA
HOVERSON, SIG
HOWARD, STEVE
HOWARD, WALT
HOWE, BERNICE
HOXIE, BETH ANN
HUDDARD, GREG
HUDDARD, RICHARD
HUBER, FRANK
HUCKER, CHRISTINE
HUFFMAN, BLAKE
HUGHES, DICK
HUGHES, KEN

JACOBS, CAROL JUNE
JACOBIE, SAUNDRA
JACOBELLO, GILES BENJAMIN
JACQUES, CATHERINE
JAMES, BOB
JAMES, LORI
JAMTHEDEN, ANNIEKA
JAMTHEDEN, LARS
JANSEN, LOTHAR
JANSSON, BERT
JANSSON, CHRISTINE
JANSSON, JANINE
JARAMILLO, DUANE
JARON, TOM
JARRETT, SCOTT
JARVA, HARRIET
JASNOCK, DEREK
JASSO, ANNETTE KELLY
JEFFERSON, TOM
JELLISON, CECIL "DON"
JENKINS, ROD
JENKINSON, ARTHUR
JENNINGS, LESLIE
JENNINGS, MARGARET
JENSEN, LARRY
JENSON, DONNA
JEHLEN, DOMINO R.
JEPSON, GARY
JERLING, CARA
JERLING, FRANCESCA
JERLING, HARA
JESSUP, AMOS
JESSUP, ARIEL
JESSUP, DALY
JESSUP, JAM
JIMENEZ, JOSE ANTONIO
JIMENEZ, ONDINA
JOHANSEN, JOHNNY
JOHANSEN, OJVID
JOHANSEN, ARNE
JOHANSSON, LESLIE
JOHNSON, JULIE
JOHNSON, LAHONT
JOHNSON, MARK
JOHNSON, MATTHEW
JONES, BOB
JONES, HARDY
JONES, JAMES "ROLI"
JONES, MARK
JONES, RORY
JONSSON, BOO
JORDAN, DAVID
JORDAN, JULIE
JORY, DONALD
JOYCE, TOM
JUELICH, BARRY
JUELICH, ED
KALAPUS, LARRY
KANDA, CAROL ANN
KAPLAN, STEVEN E.
KARAGIAHANNIS, DIMITRI
KARAS, DAVID
KATHARY, DALE
KATKE, TOM
KAWALLER, PAUL
KAY, ROB
KAYSER, JOE
KEAT, DAVID
KEAT, URSULA
KEATING, SANDRA KATHERINE
(VOSS)
KEATY, JEFF
KEELEN, DON
KEELER, DAVID
KEELER, DON
KEELERS, ANDRE
KELLY, DESS
KELLY, CHARLES
KELLY, DENNIS
KELLY, MIKE
KELLY, PATRICIA
KELLY, QUENTIN
KEMBER, JANE
KEMP, DAVID
KEMP, PAM
KEMP, RAY
KEMPF, STEPHEN P.S.J.
KEON, GWEN
KERN, LORI
KERR, GUS

OSORIO, ELEAZAR
 OSPITIA, HENRY
 OSVATH, ANDY
 OTTEN, PAULETTE
 OWELLAN, PATRICK
 OWEN, BILL
 PADEL, JOHANNA
 PACEY, DAN
 PACITTI, GINO
 PAGE, CHRISTIAN
 PAGE, SUSAN
 PAGE, VINCENT
 PALMER, HARRY
 PALMQUIST, HENRIK SVEN
 PARADIS, DENIS
 PARIER, GALIT
 PARKES, JAN
 PARKHOUSE, HERBIE
 PARKS, BILL
 PARKS, JAM
 PARLY, MIKE
 PARSELLE, CHARLES
 PASCAL, OLIVIER
 PASCOLETTI, SILVIO
 PASE, LAURIE
 PASE, MARILYN
 PASE, ROSIE
 PASENALK, ELISABETH
 PATEL, MATTHIAS (KROMMER)
 PATIKHAM, SUE
 PATRICK, BRIAN ROBERT
 PATRICK, CELIA
 PATTERSON, BOBBY
 PATTERSON, GRAHAM
 PATTERSON, THEO
 PATTINSON, PAUL
 PAUL, BILL
 PAUL, CLAUDIA
 PAVESI, ARTURO
 PAYNE, BILL
 PEACHY, LIZ
 PEARCE, GREG
 PEARCE, RON
 PEASE, GAIL
 PEASE, HOWARD
 PEDERSON, DONNA
 PEDERSON, LARS
 PEDROZA, JORGE TOMMASI
 PEDRY, KAREN
 PEDRY, WILLIAM
 PEETERSON, LARS
 PEITZ, JERRY
 PELLEGRINI, MAURA
 PELLEGRINO, TERESA
 PELLERTON, BILL
 PELLETIER, WILLIAM FRANCIS
 PENDERGRASS, KATHY
 PENNY, BOB
 PENROSE, TERESA
 PERCHINUNHO, ANTONIO
 PERCIER, RUDEN
 PERELLI, ROSE
 PERGUSON, NAT
 PERKINS, JIM
 PERLER, CRISTA
 PERLER, DANIEL
 PERLMUTTER, GARY
 PERUAS, PAUL
 PERRI, CLAUDIO
 PERRIN, STEVE
 PETERSEN, INGE
 PETERSEN, PAM
 PETERSON, DICK
 PETERSON, JANE
 PETERSON, JUSTIN
 PETERSON, RAINER
 PETERSON, SVEN
 PETIT-CADOLFI, JEAN-PIERRE
 PFAFFERHOSCHKE, FRANK KLAUS
 PFLUGER, CHRISTOPH
 PFLUGER, CLAUDIA
 PHILLIPS, RICHARD
 PHILLIS, STEFAN
 PICCINELLI, ALFREDO
 PICHETTE, BRIAN
 PICKSTOCK, KEITH
 PIETRALONGA, RAFFAELLA
 PILO, BRUNO
 PINDER, ANGIE
 PITTARELLO, MAURIZIO
 PIVO, LYNNE

PRADAT, THIERY
 PRATNER, JOAN
 PRATT, JUDY
 PRATT, PALUCIA
 PRECEZ, DEVAN
 PRICE, FREDERICK WILLIAM
 PRICE, MARVIN
 PRIER, DEBBIE
 PRIETRO, JORGE
 PRIMROSE, CLAY
 PRIOR, INEZ
 PROM, DINI
 PROSEN, TIM
 PROVENZANO, TOM
 PRUGSLEY, ALAN
 PULLEN, OTIS
 PUMTIROLI, CESARE
 PUPILLO, MASSIMO
 PUTTICK, DAVID
 QUANDER, MICK
 RACE, SYLVIA
 RADEHUILLEE, INGRID
 RAFANELLO, JOHN
 RAGGI, DANIELLE
 RAHN, GREG
 RAINE, KATHY
 RAMON, SASTRE
 RAMSEY, DAVID
 RANDALL, FREDDIE
 RANDALL, LYNN
 RANDALL, PAUL
 RANUS, ARACELI
 RASPANTE, VINCENZO
 RAUCCI, GIOVANNI
 RAUDEN, LEW
 RAXNER, MICHAEL
 RAY, DAVID
 RAYMOND, CHRIS
 RAYNER, STEPHEN
 RAZIA, GRAZIELLA
 REAVES, LARRY
 REAVIS, JOHN
 RECKERS, JIM JR
 RECTOR, GINA
 REDAELLI, FABIO
 REEZE, ROS ROYE
 REED, FRED
 REED, STEVE (HASLAN)
 REIRE, SHERRY
 REINER, LARRY
 REINERTSON, ERIC
 REINSTEDT, ERIC
 REISCH, MAE
 REISCH-FISCHER, MARIANNE
 REISDOFF, DEDE
 REITE, DAVID
 REITE, ELSE
 REITE, GABI
 REITE, LOTHAR
 REITE, PHAEDRA
 REMAR, LILLIAN
 REMITZ, BILL
 RETI, SANDRA (DOMMEL)
 REVELL, SUE
 REX, MARCI
 REZZONICO, ANDREA
 REZZONICO, BOB
 RICE, DUONE
 RICH, JON
 RICH, ROSAN
 RICHARDSON, BRENDA
 RICHARDSON, CHUCK
 RICHARDSON, KEN
 RICHARDSON, LARRY
 RICHESON, BRUCE
 RICHMAN, JOEL
 RICKARD, HARRY
 RIDDERSHOLM, CARSTEN
 RIEKE, SHERI
 RILEY, KARL
 RINALDI, DORTOLO
 RINALDI, PAOLO
 RINGQUIST, BIRGITTA
 RISSO, JOHN
 RISVOLD, TERRY
 RISVOLD, YVONNE
 RIVERA, AWILDA
 ROBERTSON, MARK
 ROBERTSON, RENE
 ROBITAILLE, YVES
 RODLES, JOLLY

ROSE, DIANA
 ROSE, KEN
 ROSE, LEONARD
 ROSENBERG, ANDREAS
 ROSENBERG, LIZA
 ROSENBLUM, ANNE
 ROSS, RICK
 ROSSEAU-ARDOIS, JORGE
 (LOKI)
 ROSSETTI, JOHN
 ROSSI, CINEIA
 ROSSI, STEFANO
 ROSSINI, TIZIANA
 ROTII, DON
 ROUMANET, MICHEL J.
 ROUSSEL, DENIS
 ROUSSET, PHILIPPE PIERRE
 ROUSSENG, MARILYNN
 ROWE, MARY
 ROWER, HOWARD
 ROWLEY, DON
 ROWLEY, LLOYD
 ROYLANCE, PAT STORMY
 RUBIN, MICHAEL
 RUBIN, MIKE
 RUFFEL, DIANE
 RUFFEL, MARK
 RUGGERI, WALTER
 RULE, DEBBIE
 RUSH, LINDA
 RUSSEL, JANET
 RUSSELL, JANET
 RUSSO, GIOVANNI
 RUSTON, MARTIN
 RYAN, B. P.
 RYAN, DILL
 RYAN, PRISCILLA
 RYSTROM, DAVE
 SAATHOFF, ROSEANN
 SAECKER, TOM
 SAHLWALL, STEFAN
 SAIWANY, DIANA
 SALA, SERENA
 SALEN, TODDE
 SALIN, DIDIER
 SALINAS, MAMMY
 SALLEH, SYLVIE
 SALONEN, PAULI
 SAM, DAVID
 SAMS, JAMIE
 SAMSON, LAURENT
 SAMUELS, GLENN
 SAMUELS, LAUREN
 SAMUELS, MARTIN
 SAMUELS, MAUREEN
 SANDERSON, HELEN
 SANDERSON, ROB
 SANDIN, ANN
 SANDQUIST, SORAN
 SANFILIPPO, ENIA
 SARAFRAI, BEHROOZ
 SARFATI, NEIL
 SARGEANT, HANK
 SARKANY, PAMELA
 SASTRE, RAMON
 SATTLER, BRIAN
 SAUCHON, PHILLIPE
 SAUERTEIG, MONI
 SAUNDERS, ANDREW
 SAUNDERS, RAY
 SANDY, ERIC
 SAWYER, LEN
 SCAGLIA, DOLORES
 SCARRONE, VALERIO
 SCHAEFER, NORM
 SCHAEFER, SIEGFRIED
 SCHEDITZ, REINHARD
 SCHELEIN, FAITH
 SCHENK, HOLGER
 SCHIRTSINGER, TENYA
 SCHLEUE, JOE
 SCHNEHAGE, JOAN
 SCHNEIDER, DORTHEA
 SCHNEIDER, RANDY
 SCHNITZER, NORBERT
 SCHOBBER, LISA MARIE
 SCHWARTZ, ASHLEY
 SCHWEITZER, JEANETTE
 SCHWETTMAN, CATHERINE
 SCIPO, ENZO
 SCOTT, DANA

SHINN, MARLENE (WEICHT)
 SHORTER, FRANCESCA
 SHREWSBURY, CAROL
 SHREWSBURY, VAL
 SHURLOCK, ELIZABETH
 SIDERSKY, ALEX
 SIDERSKY, MAGGIE
 SIEGAL, LARRY
 SIEGHEZ, DENIS
 SILVIA, MARGARET MILLER
 SIMMONS, JERRY
 SIMMONS, NOLA
 SIMONE, DEBBIE ROSEMARY
 SIMONS, DON
 SIMONS, GLEN
 SIMPSON, KATHLEEN
 SJOGREN, ROLF
 SKINNER, BOB
 SKINNER, SIAMM
 SKINNES, JAMES
 SKOGLOV, LILL-DRIIT
 SLOCUM, LESLIE
 SLOCUM, SCOTT
 SMALL, HEIDI
 SMITH, ARVA
 SMITH, BYRD
 SMITH, CHARITY
 SMITH, CHRIS
 SMITH, CRAIG
 SMITH, CYNTHIA
 SMITH, DENISE
 SMITH, GARY
 SMITH, JACK
 SMITH, JOSEPH A.
 SMITH, MARGARET
 SMITH, MIKE
 SMITH, PENELOPE
 SMITH, RICHARD
 SMITH, RODNEY
 SMITH, SANDY
 SMITH, SYLVIA L.
 SMITHERS, DENISE
 SMITHERS, FRED
 SMITHERS, GULIVER
 SHOAK, GLENN
 SHODGRASS, WAYNE
 SODERBERG, KERSTIN
 SOILES, CHRIS
 SOMMERSTADT, REINHOLD
 SORKIN, ROGER
 SOROKA, ALEX
 SOROKA, BEVERLY
 SOUTH, RANDY
 SPANGA, TOMASSO
 SPARKS, EUGENE
 SPEAR, JON
 SPEAR, RICHARD T.
 SPECIALE, TERESA
 SPEER, DARDARA
 SPEER, DENNIS
 SPENCE, MERLE
 SPENCE, MITCH
 SPICER, TOD
 SPICK, ANNETTE
 SPIES, ANDRE
 SPINA, CATERINA
 ST GEORGE, ALMEZ
 ST PIERRE, CECILLE
 STALHAKER, JAMES
 STAMM, HUGO
 STANAKER, JAMES
 STANSFIELD, HANFRED
 STANSFIELD, VALERIE
 STARK, NORMA
 STARON, GREG
 STECKLER, MICHAEL
 STEELE, CILLA
 STEGMEIER, DAVID
 STEIN, MARY
 STEINBERG, LEON
 STEINER, CATHERINE
 STEINER, DON
 STEINER, LIZ
 STEINERT, ELKE
 STEINKE, DEBBIE
 STEINS, ELLA
 STEINS, KARIN
 STENSGARD, JENS
 STEPHENSON, JOYCE
 STEQUAHER, DAVID NORMAN

ATTACHMENT

STUCKEY, GRAHAM
STUMP, ROCKY
STURGIS, KATHERINE
SUBRAM, GILBERT
SULLIVAN, CARMEL
SULLIVAN, LAUR ULLI
SUNSHINE, LEO
SURIOL, JORDI
SVEDLUND, PER
SVENSSON, JONAS
SWANN, INGO
SWART, LEON
SWETLAND, SUSAN
SWIFT, SUE
SWISKO, RENEE
SYKES, DARELL
SYMONDS, DEANE JOHN
SYNDER, BRIAN
TAAMS, ALLARD
TADUSHSK, PAT
TALBOT, DANIEL
TALHNT, KATHY
TARBT, JIM
TATONER, CHRIS
TAUGWALDER, ALOIS
TAYLOR, DRUCE
TAYLOR, DAVID
TAYLOR, GARY
TAYLOR, KIM (HUTTON)
TAYLOR, SCOTT
TAYLOR, SPANEY
TENNANT, DAVID
TENNBERG, LARS
TERRIS, RAY
TERSI, LUCA
THIELER, PHILIP
THOMAS, BOB
THOMAS, GREG
THOMAS, LARRY
THOMAS, MARK
THOMAS, RENE
THOMAS, TOM
THOME, ULLI
THOMPSON, CHRIS
THOMPSON, KARINA
THOMPSON, PATRICIA
TIMBERG, LARS
TIMPSON, RICHARD
TINNEY, MARY LOUISE
TITHUS, COLLETT
TOAJARI, DONATA
TOCKER, BRAD
TOJARI, DONATA
TOLENTINO, ERROL JOHN
TOLOSI, VINCENT
TOLOSI, WENDY
TOMASIAN, RICH
TOMS, MARIA
TOMS, SIMON PHILIP
TOMHAUSER, HEIDI
TOMHAUSER, TOMI
TOPE, BRIAN
TORAIN, EDNA
TORRENCE, HEINCY
TORRES, ANGEL
TOWERY, BRIAN
TOWNSEND, JEFFREY
TRAUBERMAN, TOM
TRELLER, MARGARET
TREMBLAY, CHANTAL
TREMBLAY, HAROLD
TRUMP, HARRY
TRENITE, KOOS NOLST
TRIGGS, SARA
TRUAX, JANE
TSCHUDIN, RES
TUCKER, RICHARD
TUGBODO, ROSALINE
TURNER, GEORGE
TURNER, JAMES
TUROL, YUSHA
TUROWSK, KARL HEINS
TUTELLIER, SARA
TYLER, CHRIS
ULANDER, HELEN
UMGER, WOLFGANG
UNQUART, KEN
URSA, DAN
VAGGI, GIAN LUCA
VALENTINO, FRANCO

VIGIL, SHANNIN
VILJOEN, MARIO
VILJOEN, WENDY
VILIA, GIUSEPPINA
VILLADA, ALBERTO
VILLAGRAM, MOISES
VILLANUEVA, PAOLO
VIN, VOS
VINCENT, DEBBIE
VINK, MOELINE
VIOLA, SONIA
VIRELLA, MILDIA NIVIA
VIRGILE, ROBERT
VISK, BOB
VISK, LYNN
VISTI, SOREN
VITOLLO, GIULIANA
VOEGEDING, DIANE
VOGEL, SEAT
VOGELBACH, CHRISTIAN
VOGELBACK, HOTTA
VOGT, PETER
VOISIN, MARYLENE
VOKET, MARK
VON AMSTEL, ANN
VON DERGEN, VRENI
VON KAPFF, ULRICH
VON LIEVEN, HANS
VOS, WIM
VOSPER, CYRIL
VOSS, RHONDA
VOSS, SANDRA KATHERINE
(KEATING)
WAITING, BRIAN
WALKER, GORDON
WALKER, JEFF
WALKER, JOHN
WALKER, MICHAEL
WALKER, NOEL
WALKER, PETER
WALKER, RUSSEL
WALKER, SYLVIA
WALLIN, LAURIE
WALSH, BRIAN
WALSH, CELIA
WALSH, KATHARINE
WALTER, ALAN
WALTER, EDDIE
WALTS, DICK
WARDLAW, ERNIE
WARDLAW, GWEN
WARDHOCK, DON
WARDHOCK, SUSAN
WARTER, CARLOS
WASHINGTON, DAVE
WASSGAETHER, HANS
WASSERMAN, KEN
WATHEN, GEORGE
WATSON, ERNA
WATSON, MARGARET
WATTS, STEVE
WAXLER, IAN
WAY, MARK
WEDDER, WENDY
WEID, AL
WEICHT, MARLENE (SHINN)
WEIDEMAN, CHRIS
WEIR, KATHY
WEISHER, HANS
WELDON, CLARK
WELKER, BETTE
WELMINGER, TOM
WENDAL, JULIE
WENLOCK, MIK
WERNICKY, AIDA
WERSOCKI, EVA MARTA
WEST, FRAN
WEST, JAY
WEST, LARRY
WESTER, DAVID
WESTPHAL, ANNETTE
WESTPHAL, KJELL
WHEELLOCK, THOMAS
WHITE, BOB
WHITE, DALLAS
WHITFIELD, NAJIMA
(ELTRINGHAM)
WHITFIELD, JERRY
WHITSON, BOB
WIEDE, AL

WIRS, ANDRE
WITHE, GZOFF
WOLERY, ERIC
WOLF, SCOTT
WOLFE, RON
WOLFENSON, AMADA
WOLLERSHEIM, LARRY
WOOD, JOHN
WOODHOUSE, VIOLET
WOODRUFF, JOAN
WOODWORTH, CHRIS
WORREST, BOB
WORTH, DENNIS EUGENE
WRAY, HEATHER
WRAY, MIKE
WRIGHT, JIM
WRIGLEY, RICHARD
WSELARY, MYRON
WUNDERLICH, KEITH FRANCIS
WYAN, RANDALL
XANDER, PAUL
YACUK, ANASTASHA
YAMET, ROBERT
YARBOROUGH, DOUG
YARID, KEITH
YARROW, ANDY
YATES, ANGELA
YOUNG, BILL
YOUNG, BOB
YOUNG, HOLLY
YOUNG, LOY
YRJOEN, VIRPI JOHANNA
YACCONI, CRISTINA
YACHARPOPOULOS, TOKIKO
YACHKOVSKI, ROBIN
YAMBO, GREG
YAMIT, NORMA
YANA, LISA
YANARDELLI, GIUSEPPE
YANARDI, CARLO
YANELLA, CLAUDIO
YANETTI, MARCO
YANNCNI, ELVIO
YAPUTIL, ANGELA
YDENICK, SINANDL
YEER, TERRY
YEGEL, JON
YEGEL, VIVIAN
YEIGLER, AMY
YENOU, JOEY
YILE, AMT

WOLFE, DEAT
VOGELBAUGH, CHRISTIAN
VOGELBAUGH, HOTTA
VOGT, PETER
VORZ, MARK
VORZ, MARILENE
VON AMSTEL, ANN
VON BENDER, VERN
VON KAPFF, UELICH
VON LIEVEN, HANS
VOS, MIN
VOS, RICHMOND
VOSPER, CYRIL
VOSSE, SANDRA KATHERINE
(KATHARINE)
WALLING, BRIAN
WALKER, GORDON
WALKER, JEFF
WALKER, JOHN
WALKER, MICHAEL
WALKER, NOEL
WALKER, PETER
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WATZ, ANN
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WARDLAW, CARM
WARDLAW, DON
WARDLAW, SUSAN
WARTER, CARLOS
WASHINGTON, DAVE
WASSERMAN, HANS
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WATSON, GEORGE
WATSON, EMMA
WATSON, HANCAHART
WATTS, STEVE
WATZ, IAN
WAY, MARK
WEEDER, MENDY
WEID, AL
WEICHT, MARLENE (SHIRIN)
WEIN, KATHI
WEISBER, HANS
WELDON, CLARK
WELTER, DOTTIE
WELTINGER, TOM
WENHAT, JULIE
WENLOCK, MIM
WERNICK, VIDA
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WEST, JAY
WEST, FRANK
WESTER, DAVID
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WHEELLOCK, THOMAS
WHITE, DOB
WHITE, DALLAS
WHITFIELD, JERRY
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WHITSON, DOB
WIEDE, AL
WIECHT, MARLENE (SHIRIN)
WILKINS, KEVIN
WILKINSON, HOWARD
WILKINSON, JULIE
WILKINSON, STACY
WILLIAMS, DEE
WILLIAMS, DICK
WILLIAMS, MIKE
WILLIAMS, MURIEL
WILLIAMS, PETER
WILLIAMS, MONTE III
WILSON, DAVID
WILSON, IAN
WINDUSH, BENJIE
WINDUSH, DEVERLEY
WINDUSH, CORALIE
WINDUSH, EILEEN
WINDUSH, RINGEL

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EXECUTIVE DIRECTIVE

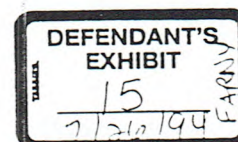
OSA INT ED 19
ALL SCIENTOLOGISTS
PUBLIC NOTICE BOARD
STAFF NOTICE BOARD

10 September 1984

SQUIRRELS

The following people have demonstrated that they cannot be trusted with the religion of Scientology or Scientologists. Their actions are destructive and aimed at the enslavement rather than the freedom of man.

Dede Voegeding
Kima Douglas
Gerry Armstrong
John Nelson
Laurel Sullivan
David Mayo



The above named squirrels have attempted to taint government with their false reports.

They have deliberately held policy up to scorn and altered such policies to suit their own destructive end.

Some of these squirrels have offered false testimony to the IRS in order to protect their overts against mankind and their only road out of this universe.

Several of them have misrepresented Scientology practices to the FBI or Justice Department in a futile attempt to taint the minds of the government and the courts against the Church of Scientology.

They have supported psychiatric aims and principles over Scientology principles in their misrepresentations to Department of Justice representatives as well as Boston lawyer Michael Flynn.

They have turned from ethical and moral Scientology principles by demanding no ethics be applied to them or by them.

Several of them have spoken out against Scientologists in good standing to the IRS in a hope that they might escape from their own destructive acts and shift attention from themselves and their crimes.

They have altered and assisted in the alteration of Tech in an attempt to seal off the bridge to those who have fallen prey to their destructive intentions.

They have altered and assisted in the alteration of Tech in an attempt to seal off the bridge to those who have fallen prey to their destructive intentions.

Their continued harmful acts to themselves and their continued desire to drag others to the level of beasts and animals devoid of spiritual qualities places them in the psychiatric camp of those who manufacture madness for profit.

Therefore, be it known that these acts of spiritual destruction and cries for no ethics, no morals, and no policy, have separated them from the body of the ethical and practicing Scientologists of this planet.

Dedicated Scientologists need not support them until they have fully recanted and fully fulfilled all of the requirements of the Ethics and Justice P/L dealing with suppressives and suppressive acts.

This ED is written that those who are not informed as to the acts of those named above may now be so informed.

It is written so that those who are not Scientologists may be warned that these individuals do not represent the Church or the religion of Scientology in any capacity.

Their only terminal is the International Justice Chief.

CO OSA INT

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AVC INT

for the
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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(X)

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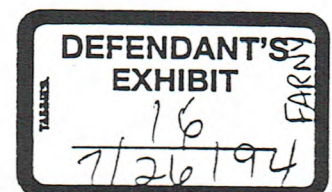
HCO POLICY LETTER OF 18 OCTOBER 1967
Issue IV

PENALTIES FOR LOWER CONDITIONS
(Applies both Orgs and Sea Org)

- LIABILITY - Suspension of Pay and a dirty grey rag on left arm and day and night confinement to org premises.
- TREASON - Suspension of pay and deprivation of all uniforms and insignia, a black mark on left cheek and confinement on org premises or dismissal from post and debarment from premises.
- DOUBT - Debarment from premises. Not to be employed. Payment of fine amounting to any sum may have cost org. Not to be trained or processed. Not to be communicated or argued with.
- ENEMY - SP Order. Fair game. May be deprived of property or injured by any means by any Scientologist without any discipline of the Scientologist. May be tricked, sued or lied to or destroyed.

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L. RON HUBBARD
Founder



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HCO POLICY LETTER OF 21 OCTOBER 1968

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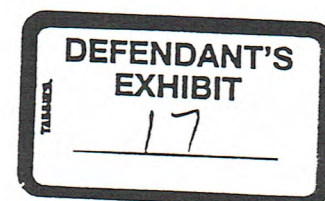
CANCELLATION OF FAIR GAME

The practice of declaring people FAIR GAME will cease. FAIR GAME may not appear on any Ethics Order. It causes bad public relations.

This P/L does not cancel any policy on the treatment or handling of an SP.

L. RON HUBBARD
Founder

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HUBBARD COMMUNICATIONS OFFICE
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HCO POLICY LETTER OF 21 NOVEMBER 1972
Issue 1

Remimeo
All PR Packs

PR Series 18

HOW TO HANDLE BLACK PROPAGANDA

RUMORS AND WHISPERING
CAMPAIGNS

"Black propaganda" (Black = bad or derogatory, propaganda = pushing out statements or ideas) is the term used to destroy reputation or public belief in persons, companies or nations.

It is a common tool of agencies who are seeking to destroy real or fancied enemies or seek dominance in some field.

The technique seeks to bring a reputation so low that the person, company or nation is denied any rights whatever by "general agreement". It is then possible to destroy the person, company or nation with a minor attack if the Black Propaganda itself has not already accomplished this.

Vicious and lying gossip by old women was the earlier form of this tactic and was so bad that some areas put them in public stocks (neck yokes) or drove them out of town.

In modern times there is no such check on Black Propaganda. Difficulties and costs of libel and slander suits, abuse of press privilege, lay anyone open to such a campaign.

All one needs is an enemy. And there are few men in history who have been without enemies.

There are random individuals in the society who do not understand very much. This is expressed as a sort of malicious glee about things. Such pass on slanderous rumors very easily. In an illiterate society such people abound. Since they cannot read, the bulk of knowledge is denied to them. Since they do not know very many words much of what is said to them is not understood.

This is not isolated to the illiterate only.

What they do not understand they substitute for with imaginary things.

Thus such persons not only listen to slander but also corrupt and twist even it.

Thus a rumor can go through a society that has no basis in truth.

When numbers of such rumors exist and are persistent, one suspects a "Whispering Campaign". This is not because people whisper these things but because like an evil wind it *seems* to have no source.

Black Propaganda makes use of such a willingness to pass on and amplify falsehoods.

Much Black Propaganda is of course more bold and appears blatantly in irresponsible (or covertly controlled) newspapers and radio and television.

But even after a bad press story has appeared or a bad radio or TV broadcast has been given, the "Whispering Campaign" is counted upon by Black Propagandists to carry the slander through the society.

Thus any person, any being, is at risk.

No person, company or nation has totally clean hands. That is left to the Saints. In childhood one stole a few apples, broke a window or two, dented a fender, went joy riding in a "borrowed" vehicle or took pennies or candy bars that weren't his own.

Childhood is quite lawless and the teenage period is often a revolt against the

DEFENDANT'S
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closer and closer fitting straightjacket of "proper social conduct". One marries the wrong spouse or goes astray with another in some incautious moment, or commits various large and small sins of which society disapproves.

Any of these things tend to make one vulnerable to attack, upon his past or repute.

A person comes to fear bad things being said about him. In the face of a Whispering Campaign, real or imagined, one tends to withdraw, tends to become less active and reach less.

This is equally true of companies and even nations.

Thus, unless one knows how to handle such an attack, one can in fact be made quite miserable and ill.

THE ATTACKER

The world is full of madmen.

The basic characteristic of extreme madness is perpetual attack, attacks on anything, attacks on persons or things which contain no menace.

Extreme, not petty, crime is at the root of such an impulse.

The attacker has an evil purpose in life. He is a thing of death, not life. And his harvest is a death harvest.

Such a person feels he cannot be safe unless everything else is dead.

His evil purpose takes many forms and expressions. The end product is the same—death.

Where an attacker has gone too far he is himself then attacked. Long bitter quarrels and national wars are alike the to and fro exchange of violence.

Where an attacker lacks the physical means of destroying others and where his own purpose would fail if disclosed, the attacks become covert.

He uses word of mouth, press media, any communication channel to spit his venom. He hides himself as the source, he makes the verbal attack seem logical or real or proven.

He counts on the utterances being picked up or distorted and passed on by the more base people in the society.

This is Black Propaganda. It is intended to reduce a real or imagined enemy, hurt his income and deny him friends and support.

Companies or associations do this to competitors. The American Medical Association maintains its multi-billion dollar monopoly over sickness by continuing a long, well financed Black Propaganda campaign against anyone it *thinks* might threaten their income. The head of their "Department of Investigation" (as they call their Black Propaganda department) once said they just kept it up and kept it up against any rival and one day WHAM! They use press releases, their own members, paid ads, displays, government connections and speakers, any channel, to release endless streams of *imaginary* tales against any *imaginary* rival. While this does bring them government support it has brought them deep hatred not only from rivals but the public at large.

They get back what they put out. They were once wealthy. They are no longer. Their members dislike them and increasingly doctors belong only to state medical societies, not the AMA. The individual doctor most often has good public relations. His main society benefits from this and betrays it. One day, no AMA. WHAM!

So Black Propaganda is not something one lightly instigates. For it recoils on the person who uses it.

Let us see how it recoils.

Too much venom put out stains one with venom.

Too much Black Propaganda gets attacks in return.

Black Propaganda is essentially a fabric of lies. The AMA simply imagines stories to put out or have put out.

Sooner or later such stories are found not to be true. ONE false story can destroy the credit of the teller. Now who listens?

Thus a Black Propaganda Campaign is vulnerable. The attacker sooner or later is attacked—often by many.

But those who have to counter such a campaign need the technology of how it is handled.

ANY NEWS

There is a natural law at work that unfortunately favors Black Propaganda.

WHERE THERE IS NO DATA AVAILABLE PEOPLE WILL INVENT IT.

This is the Law of the Omitted Data.

A vacuum tends to fill itself. Old philosophers said that "nature abhors a vacuum". Actually the surrounding pressure flows into an area of no pressure.

It is this way with a person, company or nation.

Hit by lies the person tends to withdraw. This already tends to pull things in.

The person does not then wish to put out data. He becomes to some degree a mystery.

To fill that mystery people will invent data.

This is true of persons, companies or nations.

This is where *public relations is a necessity*.

Essentially Public Relations is the art of making good works well known.

It is a fatal error to think good works speak for themselves. They do not. They must be publicized.

Essentially this is what public relations is. And this is *why* it is—to fill that vacuum of omitted data.

In the midst of a Black Propaganda Campaign one is denied normal communication channels. The press media along which the campaign is being conducted will *not* run favorable comment. One is mad if he thinks it will as it is serving other masters that mean to destroy the repute of the Target.

"Authoritative" utterances push plain truth out of sight.

Thus public relations people have to be very expert in their technology when they confront Black Propaganda.

THE TECH

When one is not fighting a battle against Black Propaganda, public relations is easy.

One hires a reporter who gets to work thinking up ideas and turning out releases. That's why reporters are often thought of as Public Relations people which they are not.

In the face of a Black Propaganda Campaign, such releases are twisted, refused and that is the end of it.

There is far more to the art than this.

These are some of the rules that apply.

1. Fill the vacuum of omitted data with factual data.
2. Prove all false utterances heard are lies.
3. Discredit every rumor encountered.
4. Handle the interest level with any utterance.
5. Carefully study out the scene until the exact source is located.

6. Use the knowledge of source to impede or destroy the source of Black Propaganda by non-criminal means.
7. Continue to fill the vacuum of no data with good data using any channels available.

Each one of these points could well take a book. But understanding them and using one's initiative one can fill in a lot of the tech himself.

The variations of each one are endless.

APPLICATION

1. Fill the Vacuum.

First of all, cease to withdraw. It is proven conclusively that in public relations handling of Black Propaganda, only outflow pays off. Saying nothing may be noble in a character but it is fatal in public relations. Yet even "experts" advise it (when they are doing their clients in).

Blunt denial is crude and can be used against one as a sort of confirmation.

You don't have to announce or spread a flap and never should. PR men often *make* the flap.

But don't interpret this as "silence is necessary". Get in a safe place and speak up.

Use any channel to speak up. But don't seek channels that will corrupt what you say in repeating it.

Don't stay on the same subject that you are being attacked on.

An example of speaking up without denying and thus confirming might be:

STATEMENT: "I read your company went broke last month."

REBUTTAL: "My God. You're telling me! If we hadn't got out of that contract we really would have gone broke. There was a hell of a row in the board room. But McLinty won. Scotch to the core. He said, 'I won't sign it!' Like to have tore the president's head off. Hell of a row. Seems like we got 80 million buried somewhere and McLinty is in charge of it and he won't *move an inch* on it."

The Interrogator's conclusion is you're not broke. He's got data. The vacuum is filled with a story of board rows and 80 million mysterious reserves.

2. Disprove False Data.

The technique of proving utterances false is called "DEAD AGENTING". It's in the first book of Chinese espionage. When the enemy agent gives false data, those who believed him but now find it false kill him—or at least cease to believe him.

So the PR slang for it is "Dead Agenting".

This consists of disproving utterly the false statement with documents or demonstration or display.

One has to have a kit (a collection of documents) or the ability to demonstrate or something to display.

STATEMENT: "I've been told you are in trouble with Income Tax people."

REBUTTAL: "Here's a document of fully paid taxes and a letter of commendation from the tax authorities." Displays some.

Result? Whoever told him that is now dead with him as an accurate informer.

The *best* way to dead agent is when the person makes some disprovable statement, find WHO to fix his mind on it and then produce the rebuttal.

STATEMENT: "I hear you aren't married to the man you're living with."

REBUTTAL: "WHO told you that?"

STATER: "I forget."

REBUTTER: "Well you remember and I'll show you some proof."

STATER: "Well, it was a man. . . ."

REBUTTER: "WHO?"

STATER: "Joe Schmo."

REBUTTER: "Okay. Here's my marriage certificate. Who's the Joe Schmo nut anyway?"

Now it's Joe Schmo who's the mystery. How come he lies? What's in it for him?

When one hasn't got the document but can get it one can say, "You tell me the name of whoever said that and next time I see you I'll show you something *very* interesting about it."

And be sure to get the document and see him again.

Dead Agenting has a billion variations. "It won't fly." Fly it. "Place is empty." Show him it's full.

The subject matter of Dead Agenting is PROOF in whatever form.

You only challenge statements you *can* prove are false and in any conversation let the rest slide.

EVERY FRIEND, EVERY OPINION LEADER, EVERY STAFF MEMBER YOU HAVE SHOULD BE SUPPLIED WITH A DEAD AGENT PACK CONTAINING PROOFS AGAINST COMMON RUMORS (AND BROCHURES AND COACHING TO FILL THE VACUUM).

3. Disprove Every Rumor.

Proving negatives is almost impossible. "How do I know you aren't a CIA man?" Well, how can one prove that? One can't whip out a KGB badge as that would be just as bad. No one ever wrote a document "Bill Till is not a member of the CIA." Useless. It is a denial. Who'd believe it?

Sometimes "You don't" works.

But the right answer to a negative (no proof) is a "fill the vacuum".

STATEMENT: "How do I know you're not a CIA man?"

REBUTTAL: "Christ, please don't insult me! The CIA tried to hire me once. Said they'd shoot me if I didn't join up. Cuba it was. I was a sugar salesman. And Batista was trying to . . . etc, etc. See this scar on my leg? (Pulls up pants.) Batista cop shot me because he thought I was CIA. So don't bring up painful subjects. (Rubs scar.) (Laugh.)"

But once in a while you *can* prove a negative. Accused of drug smuggling one can show he's a member of the anti-drug league. The counter in a negative proof must be *credible*.

A million million variations exist in Dead Agenting.

The basis of it is NOT to be the thing rumored and to be able to prove it fast.

4. Handle the Level.

Handling Interest Level is basically an exercise in the Tone Scale. (See Tone Scale Charts of Human Emotion.)

Agreement occurs at the same emotional tone level as the person making the statement. He buys his facts at that level.

To go half a tone up from his level is to command him within his zone of reality.

STATEMENT: "It's hopeless trying to believe in anyone. I thought you people were all right but now I hear you are all hippies. (In a dull apathy.)"

REBUTTAL: "Oh, oh, oh, who could have told you such a sad lie. (Sob.)"

STATER: "Wouldn't be any use to say."

REBUTTER: "(Sob.) But you've got to say. Oh, I feel so awful."

STATER: "Well he wouldn't care if I told. It's the local minister."

REBUTTER: "(Sob.) (Kleenex.) What an awful thing to say. Just because we found him dead drunk and took him home to sleep it off and he said if we ever told he'd say we're hippies."

STATER: "What a sad story. Oh, it's a bad world. How ungrateful."

You go half a tone up. Give him a story, on the subject or not. Like "(Sob) That's because we lost our instruments. We once were a band and this nightclub owner wouldn't pay us and we had to sleep in the barn (sob). . . ."

Another one.

STATEMENT: "I hear some bad things about you people. (Covert hostility.)"

REBUTTAL: "(Anger) Who would DARE say such things?"

Etc.

And story type can be matched in tone.

STATEMENT: "I hear those people stole some rowboats."

REBUTTAL: "Who said so?"

STATER: "The dock master's son."

REBUTTAL: "Oh, him. Gets things wrong. *Our* rowboat was stolen! With all the gear in it. We were out fishing and. . . . say, you don't suppose HE stole it do you? Did you ever hear of him stealing anything? Has he got a record?"

Well, this dock master's son will now "have a record" in the stater's tales. As *theft* is of interest to him, crime will also be.

5. Carefully Study Out the Scene.

The technology of finding who is shooting is very vast. But the core of it is FILING.

All PR is expensive in time or money or both. And nowhere is it more time consuming than in locating the source of a Black Propaganda Campaign.

But, to live at all, one has to engage in this search at some time or other.

One just keeps running down these tales until one locates the source.

There can be more than one *apparent* source and these can be handled. But they will at last lead to the real instigator.

One just keeps locating names and filing them, with dates.

At length one name file is very thick. That's your boy—or association or company or nation.

6. Impede or Destroy.

As you have been dead agenting as you looked, the attacks get handled. The campaign ebbs and flows but actually lessens.

There are thousands of variations on finding the real WHO.

But essentially it is just looking, dead agenting, filing, looking on and on.

You are, in this whole period, *handling*.

Once in a while it happens fast.

Now and then the Black Propagandist packs up and fades away before he is fully spotted. He becomes aware of the counter-action.

The usual action is a counter propaganda campaign *based on truth*.

It is a long-to-find and hard-learned fact that people who engage in Black Propaganda have big bursting crimes to hide.

They do not have *little* crimes. They have BIG ones.

One's own ability to confront evil may be too low to really grasp the Black Propagandist's crimes or believe they exist.

Such people are often SANCTIMONIOUS hypocrites. They are usually arrogant and will not parley (have conferences with a foe). They appear so terribly sure they are RIGHT that it fairly shakes one's confidence that they could ever do anything wrong.

Thus the Black Propagandist is not detectable as such in many cases. The lordly institution, the lofty society, the glittering country are far, far above such a nasty psychotic trick as a studied, financed, expertly run campaign of vicious lies.

Thus they are believed. Or their servants are believed. And their campaigns can be *very* effective.

But this makes them hard to suspect or detect. And it makes it hard to get anything bad about *them* believed.

But under all this are *real* crimes. Not stealing apples or pinching pennies as a child. *Real* crimes like extortion, blackmail, embezzlement and mass murder are sitting in their closets. Believe that. For in the course of your counter-attack you may despair of ever finding anything.

But you will find it.

A lofty railroad—but secretly murdering anyone who opposed their land grabs. A minister of high renown—but a secret member of and taking orders from a murder mob. The biggest and "most respected" union leader in the country—but a numbered agent of a foreign intelligence service dedicated to destroying the country's fuel capacity and defeating its president!

And each of these engaged in and never was suspected of Black Propaganda Campaigns that ruined many lives.

Bad guys tend to get rid of good guys. Sometimes for what they consider good reasons, sometimes for imagined reasons, sometimes because the bad guy just can't stand a decent bright person.

But there is no real truth in the bad guys always cause their own downfall. It may come, but it may be far too late to save the reputation or even life of the person being attacked by hidden campaigns.

Therefore it is *vital* to handle the matter. One can't just hope it will all go away. It won't. It will get disastrous to the degree that it is not handled.

The less handling, the more disastrous.

There is another hard won truth.

ONLY COUNTER-ATTACK HANDLES.

The fact is that just going on PRing oneself does not remove the effects of the campaign and all too soon one no longer has communication lines left in order to handle anything since reputation is so destroyed no one will listen and no lines remain.

One has to fill the vacuum of the counter-propagandist's evil deeds. As these are never exposed to view there is a vacuum there.

Another strange thing is that press *will* print attacks. Maybe this will no longer be true in some enlightened age. But in this era, good attacks or fights between things will get print space.

But press is very far from the only channel of communication. Governments do believe the press and think it is public opinion. A newspaper can be a fortress of some Black Propagandist. But a people often believes little it reads.

There are opinion leaders, there are letters, there is word of mouth. These are also channels of communication and really far more powerful than the press.

There is also friendly press. But a friendly-talking reporter is often the most suspect. He was so nice in the interview, so vicious in his article.

Statements one makes can be curved. "She had a birthday party" becomes "The delinquents in her circle gathered yesterday for a sex orgy and pretended to the police it was a birthday party. No one was jailed."

The brand of Black Propaganda is very easy to see in writing twists.

So it takes time and work to reverse an attack because normal channels have to be reopened and reversed.

It is done by attacks.

But attacks which are not true earn suits. So one must attack only on proven ground.

This requires a lot of hard search.

However, a Black Propagandist often has *many* other enemies. These have sometimes gathered data.

The principles are that when the sub-terminals are located, they are investigated and counter-attacked. Then further investigation reveals closer terminals to the propagandist and these are attacked. In short, one investigates and attacks.

Always be ready to parley—that is, have a conference and settle it. The arrogance of the Black Propagandist often forbids this. And when it does, it means longer and harder work and, if well done, his downfall.

In any event, the attack is a long cycle, a complex cycle and often an expensive cycle. It consists of investigate and attack.

But remember, one *must* attack once he has any idea of the identity of the Black Propagandist or even his sub-terminals.

There is no other way out.

Any other course is death.

7. Continue to Fill the Vacuum.

Continuous good works and effective release of material about one's good works is vital especially in a Black Propaganda war.

One cannot just fight.

You are in effect advertising the other fellow when you expose him repeatedly. This gives you a new sort of vacuum. One becomes known as the fellow or company or nation that attacks _____. But who really is this fellow or company or nation?

Pamphlets, brochures, press releases, one's own newspaper and magazine, one's own contacts with opinion leaders, these and many more, must be supplied with A COMPREHENSIBLE IDENTITY OF SELF.

Distributing or using these one publicizes one's own good works.

And one must also *do* good works. One can't just dedicate his life to eradicating the enemy, even when that is tempting.

On the other hand, within the dictates of safety, one cannot hide continuously. One must, through his good works and actions at least, be visible.

So a continual truthful and artful torrent of public relations pieces must occur.

Then one day there is no enemy.

And one's reputation is high.

There may be other attacks but now one can handle them as small fires and not as a whole burning forest.

WHAT IS BLACK PROPAGANDA?

You can see that Black Propaganda is a covert attack on the reputation of a person, company or nation, using slander and lies in order to weaken or destroy.

Defense presupposes that the target is not that bad.

One does not have to be perfect to withstand such an attack, but it helps.

But even if one *were* perfect it would be no defense. Almost all the saints in history have been subjected to such attacks. And most of them died of it.

The answer is PR TECHNOLOGY SKILLFULLY APPLIED.

To be skillful in anything, one has to know it and be experienced in it and DO it.

As weary a task as it may seem to some, as heartbreaking as it can be, one still has to *fight*. And fight with tools and technology and dedication superior to that of the enemy.

But progressing and getting small gains, small penetrations, small little skirmishes and battles one at length comes up to victory after victory and at last wins the whole war.

One is saved.

L. RON HUBBARD
Founder

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Saint Hill Manor, East Grinstead, Sussex

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Issue III

Remimeo

PR Series 7

BLACK PR

About the most involved employment of PR is its covert use in destroying the repute of individuals and groups.

More correctly this is technically called BLACK PROPAGANDA.

Basically it is an intelligence technique.

It can be a serious error to cross Intelligence and PR.

These are two different fields. They have two distinctly different technologies.

A PR man must also know something of intelligence technology. Otherwise one day he will be left gaping.

Intelligence is intelligence. PR is PR.

When you gather information by intelligence procedures and at once employ it for PR, the result is likely to be poor.

It is not that it isn't done. It's that it isn't very effective. Also it is an act of desperation.

PR IS OVERT.

INTELLIGENCE IS COVERT.

PR is at its best when it begins and ends overtly.

Intelligence is best when it begins and ends covertly..

PR with an open demand by known authors, a demonstration, a conference is normal PR.

Intelligence trembles on the edge of PR when filched data explodes a storm in the public. It recoils when the authors are then known.

Black Propaganda is in its technical accuracy, a covert operation where unknown authors publicly effect a derogatory reaction and then remain unknown.

The effect of Black Propaganda is largely wiped out by "Oh, it was the Germans who set them up."

So PR enters intelligence in this way: One finds who set up the Black Propaganda and explodes that into public view.

This use of PR is almost that of an auditor to the group. One is disclosing hidden sources of aberration.

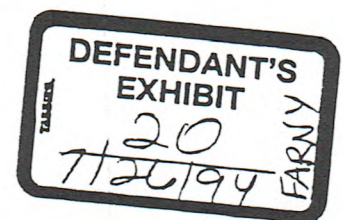
To use intelligence to find where they hid the body and then flip over into wide publicity is not very powerful in actual practice. There better be a body there and one better tell the police not the public.

If there are no effective police, then one has the problem of police action. Exploding it to the public ideally is an effort to make the public a vigilante committee. Modern publics seldom rise this high. Educated publics seldom explode to the explosion.

A PR man who thinks taking Blitz & Company's crimes to the public is really just dreaming hopefully—without foundation. It may or may not hurt Blitz. It might recoil. The ability of the public to stand around and look stupidly at a dripping handed murderer without doing a thing about it is a symptom of our civilization. They *ought* to act. They don't. You can form an opinion amongst them but governing bodies won't consult it.

Exposure is not an effective road to *action*. It can be to opinion. It is slow.

Then what is effective?



INTELLIGENCE

By definition Intelligence is covert. Under cover. If it is kept so all the way it is effective.

When Intelligence surfaces it becomes very ineffective.

Threat and mystery are a lot of the power of intelligence. Publicity blows it.

Take the Red Orchestra, World War II, Stalingrad Campaign. In Berlin Schultz-Boysen and other highly placed Russian agents got the whole German plan of the battle that was to be Stalingrad. Brilliant and covert intelligence. They passed it to the Russians. Brilliant and covert comm. The boss at Centre in Moscow put the ring's names and addresses in a code radio message. The Germans of course broke the code. The Germans rounded them up and messily executed them on meat-hooks. The Germans had no other battle plans but contemplated not attacking Stalingrad that way. This put the whole coup at risk. Then the Germans did use the plans the Russians knew and that was the beginning of the end of WW II.

So TWO exposures threatened the success of this intelligence coup. One was the stupid radio message. The other was the realization the Russians had the battle plans.

Exposure is the basic threat of intelligence.

PR is the willful broadcast of information.

The two don't mix well.

BLACK PROPAGANDA

Possibly used since the morning pale of history, Black Propaganda was developed by the British and German services in World War I into a fine art.

The word "propaganda" means putting out slanted information to populations.

One propagandizes the enemy population or one's own or neutrals.

In popular interpretation it is a parade of lies or half truths or exaggerations.

PR and advertising technology and mass news media are employed as well as word of mouth and posters.

The trouble with it is that it can often be disproven, discrediting the utterers of it.

It may serve the moment but after a war it leaves a very bad taste.

If one is engaging on a campaign of this nature, its success depends on sticking to the truth and being able to document it.

The entire black propaganda campaign conducted for 21 years against Scientology began to fold up in its 16th year because never at any time did its instigators (a) have any factual adverse data or (b) tell the truth.

The Scientology movement continued if only by heroic means and much sacrifice.

But at last nobody of any note believed the propaganda.

The attackers pulled in on themselves a counter attack based on penetrating horrible documented truth.

It required intelligence-like tactics to discover who it was exactly.

The "dead agent caper" was used to disprove the lies. This consisted of counter-documenting any area where the lies were circulated. The lie "they were _____" is countered by a document showing "they were *not*." This causes the source of the lie and any other statements from that source to be discarded.

That real trouble and damage was caused Scientology is not to be discounted. The brilliance of the defense was fantastic. The depth and inroads the propagandists reached was alarming. BUT THEY DIDN'T MAKE IT.

Some Black Propaganda campaigns have won in other areas, not Scientology.

The British got the US into World War I with Black Propaganda, despite a president elected on a peace platform.

Many individuals have been destroyed by Black Propaganda. Wilhelm Reich was by the lies and violence of the FDA.

So Black Propaganda is not a certain result technology. It is costly. It makes fantastic trouble.

Essentially it is NOT a PR campaign. It is a cross between PR and Intelligence.

The technique is:

A hidden source injects lies and derogatory data into public view.

Since it is a hidden source, it requires an intelligence approach to successfully end it.

In the meanwhile the "dead agent caper" is the best tool to counter it.

Legal action can restrain such a campaign but is chancy unless one knows the source or at least has counter-documents. It is risky solely because "law" is unpredictable. However legal action has a definite role in restraining, not in ending such a campaign.

A good policy when faced with a Black Propaganda campaign is to defend as best you can (dead agent and legal restraints) while you find out (intelligence) WHO is doing it. Then, confrontation can occur. Finding and suing false whos can make things much more involved.

Black Propaganda counter-campaigns are inevitable. One engages upon them whether he would or no. These are engaged on while one narrows down the area to an exact WHO. For instance, one knows the whatsits are attacking one. Thus he can counter-attack the whatsits. But *what* are the whatsits exactly? and to whom are they connected? and exactly WHO, an individual always, is keeping it going? These last three have to be answered eventually. And that requires an intelligence type search.

THE CROSS

So there is where Intelligence and PR cross.

When PR goes into Black Propaganda (hidden source using lies and defamation to destroy) it has crossed intelligence with publicity. They don't mix well.

The action is risky to engage upon as it may run into an ex-intelligence officer or trained intelligence personnel. It may also run into a dead agent caper or legal restraint.

Anyone engaging in Black Propaganda is either using a wrong way to right a wrong or confessing he can't make it in open competition.

PROTEST PR

Outright Protest PR, based on facts is a legitimate method of attempting to right wrongs.

It has to be kept overt. It has to be true.

Protest PR can include demonstrations, hard news stories and any PR mechanism.

Minorities have learned that only Protest PR can get attention from politicians or lofty institutions or negligent or arrogant bosses.

Where Protest PR is felt to be a necessity, *neglect* has already occurred on the issues.

The riots of Panama some years ago were very violent, verging on open war. This followed the negligence of the US in negotiating new treaties, a matter arranged for long ago and arrogantly skipped for several years by the US.

The slaves were freed in 1864 but were either misused or neglected for the next century and finally became a key racial problem full of demonstrations and riots and social unrest. Imperfect redress of wrongs following these then continued the riots. This is probably the biggest PR mess of the last century and a half wobbling this way and that. It is still in the stage of Protest PR, possibly because it went so very, very long unhandled.

The only real recourse these people had was Protest PR. Recently, black Congressmen were refused audience by the President and had to stage a demonstration before it was granted. But Protest PR *did* obtain an audience.

The silliest idea of modern times is conscription. Drafted soldiers might possibly be excused as a levee en masse but not as the habit of government in peace and war just to overcome their lack of ability to make the country worth fighting for and the armed services a stable attractive career. This is all the more foolish since hardly anyone in history ever had any trouble recruiting an army that could pay for one. Even Gibbon remarks on it as an amazingly easy thing to do in any civilization. And that is true today.

So conscription is continued. Facing every young man with an arbitrary military future was a bad thing. Napoleon invented it and he lost.

Protest PR was the answer used to contest it. Met by force and violence, it has not halted.

Somebody will have to give the country a nobler cause more decently prosecuted, will have to better the services and conditions and will have to admit men without demanding their right names or perfect physique and make them immune to recall for civil offenses. Probably that army would fight well. Conscript services are too expensive, too inefficient and too ready to revolt for any sane government to use them. But here this unhandled wrong has to resort to Protest PR.

So Protest PR has its place. It is a fine art. It is the subject of fantastic skill and tech.

It is not good. But it does work and it is used as a last resort when normal hearings and good sense fail.

When money and force lead and opinion leaders are unheeded, when special privilege enters management or government, Protest PR, the strike, the demonstration, is the tool employed.

If that doesn't work, or if it is crushed, subversive actions, general intelligence actions, Black Propaganda and other evils occur.

PR used soon enough can avert much of these consequences.

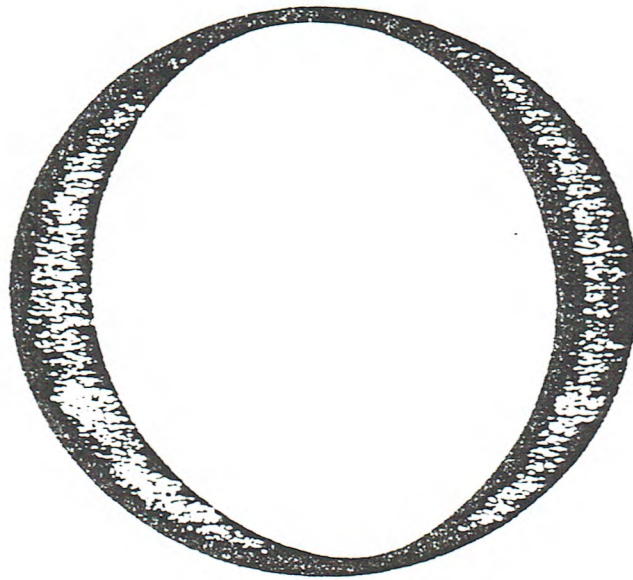
But there are always two in any fight and the other side may not want to live and so set themselves up.

Intelligent early PR is the best remedy. But it is not always possible.

L. RON HUBBARD
Founder

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MAGAZINE ARTICLES ON
LEVEL



CHECKSHEET
BY L. RON HUBBARD

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Dissemination of Material

The dissemination of materials of Scientology is a problem of comparable stature to the use of techniques on a preclear in an auditing session. Just as you would not process a preclear with heavy processes when all he could take might be ARC Straight Wire, thus you would not issue Scientology materials of considerable weight to people incapable of assimilating them.

The immediate result of the issuance of materials not intended for that audience is to produce a state of confusion in the minds of that audience regarding Scientology. Here we have no question of talking down to people. Here we have no question of 'watering' our material, but we do have a question of disseminating Scientology. If we do it properly, then Scientology will be very broadly known. If we do it improperly it will stop in its tracks, and be known, if at all, as a confusion.

When materials are issued above the acceptance level of an audience, a confusion results. A confusion is the antithesis of a flow. Any communication resulting in a confusion then brings about an eddy or tumbling of particles rather than their spread. And a confusion at length becomes a mystery.

Part ten of the Code of a Scientologist says: "I pledge myself to engage in no unseemly disputes with the uninformed on the subject of my profession." This is an immediate injunction not to start an eddy of confusion. The employment of Scientology to the greatest good of the greatest number of Dynamics does not include using it knowingly or unknowingly to confuse hearers.

An outline of the communication lines of Scientology follows:

1. The General public to the general public.
2. Scientologists to the general public.
3. Member HASI to member HASI.
4. Trained Scientologist to a member of the HASI.
5. Member of the HASI to a preclear.
6. Trained Scientologist to a preclear.
7. Trained Scientologist to a trained Scientologist.
8. HASI to membership.
9. HASI to trained Scientologist.
10. HASI to the general public

1. GENERAL PUBLIC TO THE GENERAL PUBLIC

There are several things we would like the general public to say to the general public about Scientology. The first of these is that we would like the general public, when it sees an individual or group problem, to be quite certain that the proper thing to do is for that individual or group to consult a Scientologist. For instance, if somebody is having headaches, we would like his friends to come to the obvious solution that this person should see a Scientologist or should join a group undergoing processing.

The next on this communication line is that Scientology does not pose any threat, that Scientologists are good citizens, and that they can be trusted with problems of a private and confidential nature, or with problems dangerous to other people, such as the problem of criminality. Another frame of mind we would like to see the public have and register is that people attacking Scientologists have something wrong with them (and if you could meet any such people personally you would see that this is no more than truth). As a subdivision of this, the actual substance of communication about what Scientology is, from the general public to the general public, should be that Scientology says that good health and immortality are attainable. That it is something compounded out of all Man knows of the subject of Man, and that people are living units operating bodies, rather than bodies, and that this living unit is the human soul. Given this much communication line, the general public can embroider enormously, and unless a person in the general public can express his opinions, and unless the subject gives him a chance to express his own opinions, and so let HIM be interesting, he will not talk about the subject. Thus the data in the general public should give individuals a chance to be interesting, by knowing no more and no less than the above. We are not interested in sensationalism personalities, or the complexity of Scientological methodology being discussed by the general public. As a subdivision of this, we do not want Scientology to be reported in the press, anywhere else than on the religious page of newspapers. It is destructive of word of mouth to permit the public presses to express their biased and badly reported sensationalism. Therefore we should be very alert to sue for slander at the slightest chance so as to discourage the public presses from mentioning Scientology. What the newspapers say is not word of mouth. As an example of this, how many minutes today have you spent in discussing current events? **NEWSPAPER REPORTERS WRITING ARTICLES ON SCIENTOLOGY DO NOT EXPRESS SCIENTOLOGY.** Scientologists should never let themselves be interviewed by the press. That's experience talking!

As a subdivision of general public to general public we have the problem of the professions which might consider Scientology to be antipathetic to them, amongst these would be psychologists and medical doctors as well as psychiatrists. These persons are entirely in error when they express the opinion that Scientologists are against

them. Scientology does not consider them sufficiently important to be against. Flour-pills or any incantation or system will produce in 22 per cent. of the public, benefit. Therefore, any practice or art can always achieve 22 per cent. recovery in their patients. It is when we better this 22 per cent. that we are being efficient. We have no more quarrel with a psychologist than we would have with an Australian witch-doctor. We have no quarrel with a psychiatrist any more than we should quarrel with a barbarian because he had never heard of nuclear physics. And as for the medical doctor, we know very well that modern medical practice, having lately outgrown phlebotomy, has come of age to point where it can regulate structure in a most remarkable and admirable way. In Scientology we believe a medical doctor definitely has his role in a society just as an engineer has his role in civil government. We believe that a medical doctor should perform emergency operations such as those made necessary by accidents; that he should perform orthopaedics; that he should deliver babies; that he should have charge of the administration of drugs; that his use of antibiotics is beneficial; and that wherever he immediately and curatively addresses structure he is of use in a community. The only place we would limit a medical doctor is in the field of treatment of psychosomatic medicine, where he has admittedly and continuously failed, and the only thing we would ask a medical doctor to change about his practice is to stop taking money for things he knows he cannot cure, i.e., spiritual, mental, psychosomatic, and social ills.

With regard to psychologists, medical doctors, and psychiatrists, then, what would one say in talking with them? But again we have section 10 of the Code of the Scientologist. You wouldn't expect this psychologist, or psychiatrist, or medical doctor to get into an argument with you on how to get rats or find their way through mazes, how you would set a tibia, or what voltage you would put on an electric shock machine. Therefore, and equally, do not permit yourself to be put in the situation where you are discussing privately or in public, the methodologies of your wisdom. The attitude of a Scientologist toward people is these professions should be: "I have my techniques. It took me a long time to learn them just as it took you a long time to learn yours, and I am not going to try to make a minister out of you, and you are not going to try to make a medical doctor (psychiatrist, psychologist) out of me. I am an expert instructor only where it is intimately involved with the human spirit. I can produce my effects. You can produce yours. In view of the fact that you do not pretend to operate in the field of the human spirit, and I do not pretend to operate in the field of structure, I do not see how there can be any discussion. But things that I can't handle in structure when called upon I will be very happy to refer to you, and I shall expect that when matters of the spirit come into question you will have enough understanding of life, where we are all specialists, to refer them to me." A quiet explanation of this character will do a great deal to place you as a professional man in their realm of understanding of professional men.

Should anyone challenge you for having suddenly secured a relief in a hospital or an institution from some dire malady which balked the efforts of the professional men in charge of it, and should you ever be "called upon the carpet" for having "interfered" with the progress of a case, you should be extremely dismayed, and act it, to find yourself in the presence of barbarians who do not believe in the power of prayer, in the will of God, or the promises of Jesus Christ. And you should point out that, whereas the body was in their keeping, they did not at any time care to take purview of the human soul. And if anything has occurred because the soul, in your province, then reacted upon the body, you believe that they are unwilling to admit the will of God in their treatment of human beings, and if this is the case you now, while you are being addressed by such people, discover yourself to be in a strange place where men pretending to be Christians doubt God, the Son of God, and the power of prayer. Your entire address to such people, in such a situation, publicly or privately, should be entirely overt, accusative, and not at any time apologetic. And you should immediately make it your business to place this matter before the proper authorities, that people are in charge of an institution here, are not Christians, and do not believe in God, and you should inform your accusers that you are going to do so.

Should you ever be arrested for practicing Scientology, treating people, make very sure, long before the time comes, that you have never used drugs or surgery, and that you have never prescribed a diet, or vitamins, and when that time might come, make very sure that you immediately and instantly, within two or three hours after your receipt of the warrant, have served upon the signer of that warrant, a personal civil suit for \$100,000.00 damages for having caused the arrest of a Man of God going about his business in his proper profession, and for having brought about embarrassing publicity and molestation. Place the suit and WIRE THE HASI IMMEDIATELY. Make the whole interest during the entire time of such an unfortunate occurrence the fact that the signer of such a warrant, who would ordinarily be a medical doctor in charge of the medical department of some city, had dared fly in the teeth of religion. And use what is necessary of the earlier passage above to drive the point home. DO NOT simply fall back out of communication if you are attacked, but attack, much more forcefully and artfully and arduously. And if you are foolish enough to have an attorney who tells you not to sue, immediately dismiss him and get an attorney who will sue. Or, if no attorney will sue, simply have an HASI suit form filled out and present it yourself to the county clerk in the court of the area in which your case has come up.

IN ALL SUCH CASES OR ARREST FOR THE PRACTICE OF SCIENTOLOGY, THE HASI WILL SEND A REPRESENTATIVE AT ONCE, BUT DO NOT WAIT FOR HIS ARRIVAL TO PLACE THIS SUIT. THE SUIT MUST ALREADY HAVE BEEN FILED WHEN THE HASI ATTORNEY ARRIVES.

In other words, do not, at any moment leave this act unpunished, for, if you do you are harming all other Scientologists in the area. When you are attacked it is your responsibility then to secure from further attack not only yourself but all those who work with you. Cause blue flame to dance on the court house roof until everybody has apologized profusely for having dared to become so adventurous as to arrest a Scientologist who, as a minister of the church, was going about his regular duties. As far as the advances of attorneys go that you should not sue, that you should not attack, be aware of the fact that I, myself, in Wicinita, Kansas, had the rather interesting experience of discovering that my attorney employed by me and paid by me, had been for some three months in the employ of the people who were attacking me, and that this attorney had collected some insignificant sum of money after I hired him, by going over to the enemy and acting upon their advices. This actually occurred, so beware of attorneys who tell you not to sue. And I call to your attention the situation of any besieged fortress. If that fortress does not make sallies, does not send forth patrols to attack and harass, and does not utilize itself to make the besieging of it a highly dangerous occupation, that fortress may, and most often does, fall.

The DEFENSE of anything is UNTENABLE. The only way to defend anything is to ATTACK, and if you ever forget that, then you will lose every battle you are ever engaged in, whether it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. DO, yourself, much MORE CHARGING, and you will WIN. And the public, seeing that you won, will then have a communication line to the effect that Scientologists WIN. Don't ever let them have any other thought than that Scientology takes all of its objectives.

Another point directly in the interest of keeping the general public to the general public communication line in good odor: it is vitally important that a Scientologist put into action and overtly keep in action Article 4 of the Cole: "I pledge myself to punish to the fullest extent of my power anyone misusing or degrading Scientology to harmful ends." The only way you can guarantee that Scientology will not be degraded or misused is to make sure that only those who are trained in it practice it. If you find somebody practicing Scientology who is not qualified, you should give them an opportunity to be formally trained, at their expense, so that they will not abuse and degrade the subject. And you would not take as any substitute for formal training any amount of study.

You would therefore delegate to members of the HASI who are not otherwise certified only those processes mentioned below, and would discourage them from using any other processes. More particularly, if you discovered that some group calling itself "precept processing" had set up and established a series of meetings in your area, that you would do all you could to make things interesting for them. In view of the fact that the HASI holds the copyrights for all such material, and that a scientific organization of material

can be copyrighted and is therefore owned, the least that could be done to such an area is the placement of a suit against them for using materials of Scientology without authority. Only a member of the HASI or a member of one of the churches affiliated with the HASI has the authority to use this information. The purpose of the suit is to harass and discourage rather than to win.

The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, well knowing that he is not authorized, will generally be sufficient to cause his professional decease. If possible, of course, ruin him utterly.

A D.Sen. has the power to revoke a certificate below the level of D.Sen. but not a D.Sen. However, he can even recommend to the *CECS of the HASI that D.Sens. be revoked, and so any sincere Scientologist is capable of policing Scientology. This is again all in the interest of keeping the public with a good opinion of Scientology, since bad group processing and bad auditing are worse than bad publicity and are the worst thing that can happen to the general public to general public communication line.

The best thing that can happen to it is good auditing, good public presentation, and a sincere approach on the subject of Scientology itself. Remember, we are interested in ALL treatment being beneficial, whether it is Scientology or not. For bad treatment in any line lowers the public opinion of all treatment.

In addressing persons professionally interested in the ministry, we have another interesting problem in public presentation. We should not engage in religious discussions. In the first place, as Scientologists, we are gnostics, which is to say that we know what we know. People in the ministry ordinarily suppose that knowingsness and knowledge are elsewhere resident than in themselves. They believe in belief and substitute belief for wisdom. This makes Scientology no less a religion, but makes it a religion with an older tradition and puts it on an intellectual plane.

Religious philosophy, then, as represented by Scientology, would be opposed in such a discussion to religious practice. We are all-denominational rather than non-denominational, and so we should be perfectly willing to include in our ranks a Moslem, or a Taoist, as well as any Protestant or Catholic, while people of the ministry in Western civilization, unless they are evangelists, are usually dedicated severely to some faction which in itself is in violent argument with many other similar factions. Thus these people are ready to argue and are practiced in argument, and there are more interpretations of one line of scripture than there are sunbeams in a day. Beyond explaining one's all-denominational character, explaining that one holds the Bible as a holy work, one should recognize that the clergy of Western Protestant churches defines a minister or the standing

*Committee for Examinations, Certification and Services.

of a church by these salient facts: Jesus Christ was the Savior of Mankind, Jesus Christ was the Son of God.

We in Scientology find no argument with this, and so in discussing Scientology with other ministry one should advance these two points somewhere in the conversation. Additionally, one should advance to the ministry exactly those things mentioned earlier as what we would like the general public to believe. Christ, if you care to study the New Testament, instructed his disciples to bring wisdom and good health to man, and promised mankind immortality, and said the Kingdom of Heaven was at hand, and the translators have not added that "at hand" possibly meant three feet back of your head. We could bring up these points but there is no reason to. You are not trying to educate other ministry. A friendly attitude toward other ministry in general, and fellow ministers in particular, is necessary.

The way to handle an individual minister of some other church is as follows: get him to tell you exactly what HE believes, get him to agree that religious freedom is desirable, then tell him to make sure that if that's the way he believes, he should keep on believing that, and that you would do anything to defend his right to believe that.

None of these people as individuals are antipathetic. They know a great deal about public presence, and can be respected for such knowledge. However, engaging in long discourses, or trying to educate a minister of some Protestant church or a priest of the Catholic faith into the tenets of Scientology is not desirable and is directly contrary to Article 10 of the Code of a Scientologist.

You will find you have many problems and people in common with other ministers. They're alive too. Also you will see a campaign to place only ministers in charge of the mind, and mental healing. Talk about these things.

The Christian Church has been hurt by factionalism. We stand for peace and happiness. Therefore, let us carry it forward by example, not by unseemly discussions.

2. SCIENTOLOGISTS TO THE GENERAL PUBLIC

In the assemblage of congregations, and in addressing the general public at large, a Scientologist has a responsibility to give to the public, in the form of such congregations or meetings, information acceptable to them, which can be understood by them, and which will send them away with the impression that the Scientologist who addressed them knew definitely what he was talking about and that Scientology is an unconfused, clear-cut subject.